PART 70 OPERATING PERMIT
and ENHANCED NEW SOURCE REVIEW (ENSR)
OFFICE OF AIR MANAGEMENT

Avery Dennison MFD
650 West 67th Avenue
Schererville, Indiana 46375-1390

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 and 326 IAC 2-1-3.2 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T089-7441-00062	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Management	Issuance Date:

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Management (OAM). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary commercial gravure printing and pigment and lacquer manufacturing operation.

Responsible Official:	Matthew S. Mellis
Source Address:	650 West 67th Avenue, Schererville, Indiana 46375-1390
Mailing Address:	650 West 67th Avenue, Schererville, Indiana 46375-1390
SIC Code:	2754, 2816, 2851
County Location:	Lake
County Status:	Severe Nonattainment for Ozone. Nonattainment for PM10 and SO2. Attainment for all other criteria pollutants.
Source Status:	Part 70 Permit Program Major Source, under Emission Offset Rules; Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

(1) Two (2) packaging rotogravure printing press, installed in 1974 and 1985, identified as C-7 and C-10, and one (1) Pilot packaging rotogravure printing press, installed in 1995, identified as Texmac, all controlled by one (1) 11.2 million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer, exhausting to two (2) stacks (C-7A and C-7B);

(2) One (1) packaging rotogravure printing press, installed in 1985, identified as C-8, controlled by one (1) 9.0 million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer, exhausting to one (1) stack (C-8);

(3) One (1) lacquer production area, consisting of the following equipment:

(A) Two (2) mixers, installed in 1974, identified as 700, each with maximum capacity of thirty (30) horsepower;

(B) One (1) mixer, installed in 1993, identified as 709, with maximum capacity of five (5) horsepower;

(C) One (1) mixer, installed in 1993, identified as 711, with maximum capacity of ten (10) horsepower;

(D) One (1) mill, installed in 1974, identified as 702, with maximum capacity of seventy-five (75) horsepower;

(E) Two (2) mixers, installed in 1993, identified as 713 and 714, each with maximum capacity of thirty (30) horsepower;

(F) One (1) ER mixer tank, installed in 1993, identified as 710, with maximum capacity of ten (10) horsepower;

(G) One (1) GM mixer tank, installed in 1993; and

(H) Two (2) sandmills, installed in 1993, identified as 802 and 803.

(I) Two (2) Schold mixers to be located in the Production Area, with maximum capacity of thirty (30) horsepower.

(4) One (1) pigment production homogenizer tub, installed in 1974, identified as PP-2; and

(5) One (1) hazardous waste above ground storage tank, installed in 1985, with maximum storage capacity of 6,000 gallons.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This stationary source also includes the following insignificant activities which are specifically regulated, as defined in 326 IAC 2-7-1(21):

(1) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6;

(2) Seven (7) volatile organic liquid storage tanks, each with maximum storage capacity of 3,000 gallons; and

(3) One (1) natural gas fired boiler, constructed in 1986, identified as F, with maximum heat input capacity of 5.25 million British thermal units per hour.

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary source is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

(a) It is a major source, as defined in 326 IAC 2-7-1(22);

(b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [326 IAC 2-1-10] [IC 13]

(a) Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a Part 70 permit under 326 IAC 2-7.

(b) This prohibition shall not apply to alleged violations of applicable requirements for which the Commissioner has granted a permit shield in accordance with 326 IAC 2-1-3.2 or 326 IAC 2-7-15, as set out in this permit in the Section B condition entitled “Permit Shield.”

B.2 Definitions [326 IAC 2-7-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, any applicable definitions found in IC 13-11, 326 IAC 1-2 and 326 IAC 2-7 shall prevail.

B.3 Permit Term [326 IAC 2-7-5(2)]

This permit is issued for a fixed term of five (5) years from the effective date, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3.

B.4 Enforceability [326 IAC 2-7-7(a)]

(a) All terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM.

(b) Unless otherwise stated, terms and conditions of this permit, including any provisions to limit the source’s potential to emit, are enforceable by the United States Environmental Protection Agency (U.S. EPA) and citizens under the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-7-10] [326 IAC 2-7-4(a)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source’s existing permit, consistent with 326 IAC 2-7-3 and 326 IAC 2-7-4(a).

B.6 Severability [326 IAC 2-7-5(5)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-7-5(6)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Supplement and Provide Information [326 IAC 2-7-4(b)] [326 IAC 2-7-5(6)(E)]

(a) The Permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall furnish to IDEM, OAM within a reasonable time, any information that IDEM, OAM may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit.

(c) Upon request, the Permittee shall also furnish to IDEM, OAM copies of records required to be kept by this permit. If the Permittee wishes to assert a claim of confidentiality over any of the furnished records, the Permittee must furnish such records to IDEM, OAM along with a claim of confidentiality under 326 IAC 17. If requested by IDEM, OAM, or the U.S. EPA, to furnish copies of requested records directly to U. S. EPA, and if the Permittee is making a claim of confidentiality regarding the furnished records, then the Permittee must furnish such confidential records directly to the U.S. EPA along with a claim of confidentiality under 40 CFR 2, Subpart B.

B.9 Compliance with Permit Conditions [326 IAC 2-7-5(6)(A)] [326 IAC 2-7-5(6)(B)]

(a) The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit constitutes a violation of the Clean Air Act and is grounds for:

(1) Enforcement action;

(2) Permit termination, revocation and reissuance, or modification; or

(3) Denial of a permit renewal application.

(b) It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

B.10 Certification [326 IAC 2-7-4(f)] [326 IAC 2-7-6(1)]

(a) Any application form, report, or compliance certification submitted under this permit shall contain certification by a responsible official of truth, accuracy, and completeness. This certification, and any other certification required under this permit, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, on the attached Certification Form, with each submittal.

(c) A responsible official is defined at 326 IAC 2-7-1(34).

B.11 Annual Compliance Certification [326 IAC 2-7-6(5)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The certification shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was based on continuous or intermittent data;

(4) The methods used for determining compliance of the source, currently and over the reporting period consistent with 326 IAC 2-7-5(3);

(5) Any insignificant activity that has been added without a permit revision;

(6) Such other facts, as specified in Sections D of this permit, as IDEM, OAM may require to determine the compliance status of the source.

The submittal by the Permittee does require the certification by the “responsible official” as defined by 326 IAC 2-7-1(34).

B.12 Preventive Maintenance Plan [326 IAC 2-7-5(1),(3) and (13)] [326 IAC 2-7-6(1) and (6)] [326 IAC 1-6-3]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall prepare and maintain Preventive Maintenance Plans (PMP) within ninety (90) days after issuance of this permit, including the following information on each facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions;

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

If due to circumstances beyond its control, the PMP cannot be prepared and maintained within the above time frame, the Permittee may extend the date an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The Permittee shall implement the Preventive Maintenance Plans as necessary to ensure that lack of proper maintenance does not cause or contribute to a violation of any limitation on emissions or potential to emit.

(c) PMP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM.

B.13 Emergency Provisions [326 IAC 2-7-16]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-7-16.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describe the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAM within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone Number: 1-800-451-6027 (ask for Office of Air Management, Compliance Section), or
Telephone Number: 317-233-5674 (ask for Compliance Section)
Facsimile Number: 317-233-5967

(5) For each emergency lasting one (1) hour or more, the Permittee submitted notice, either in writing or facsimile, of the emergency to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-7-5(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions) for sources subject to this rule after the effective date of this rule. This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAM may require that the Preventive Maintenance Plans required under 326 IAC 2-7-4-(c)(9) be revised in response to an emergency.

(f) Failure to notify IDEM, OAM by telephone or facsimile of an emergency lasting more than one (1) hour in compliance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-7 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value.

Any operation shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

B.14 Permit Shield [326 IAC 2-7-15]

(a) This condition provides a permit shield as addressed in 326 IAC 2-7-15.

(b) This permit shall be used as the primary document for determining compliance with applicable requirements established by previously issued permits. Compliance with the conditions of this permit shall be deemed in compliance with any applicable requirements as of the date of permit issuance, provided that:

(1) The applicable requirements are included and specifically identified in this permit; or

(2) The permit contains an explicit determination or concise summary of a determination that other specifically identified requirements are not applicable.

(c) If, after issuance of this permit, it is determined that the permit is in nonconformance with an applicable requirement that applied to the source on the date of permit issuance, including any term or condition from a previously issued construction or operation permit, IDEM, OAM shall immediately take steps to reopen and revise this permit and issue a compliance order to the Permittee to ensure expeditious compliance with the applicable requirement until the permit is reissued. The permit shield shall continue in effect so long as the Permittee is in compliance with the compliance order.

(d) No permit shield shall apply to any permit term or condition that is determined after issuance of this permit to have been based on erroneous information supplied in the permit application.

(e) Nothing in 326 IAC 2-7-15 or in this permit shall alter or affect the following:

(1) The provisions of Section 303 of the Clean Air Act (emergency orders), including the authority of the U.S. EPA under Section 303 of the Clean Air Act;

(2) The liability of the Permittee for any violation of applicable requirements prior to or at the time of this permit's issuance;

(3) The applicable requirements of the acid rain program, consistent with Section 408(a) of the Clean Air Act; and

(4) The ability of U.S. EPA to obtain information from the Permittee under Section 114 of the Clean Air Act.

(f) This permit shield is not applicable to any change made under 326 IAC 2-7-20(b)(2) (Sections 502(b)(10) of the Clean Air Act changes) and 326 IAC 2-7-20(c)(2) (trading based on State Implementation Plan (SIP) provisions).

(g) This permit shield is not applicable to modifications eligible for group processing until after IDEM, OAM has issued the modifications. [326 IAC 2-7-12(c)(7)]

(h) This permit shield is not applicable to minor Part 70 permit modifications until after IDEM, OAM has issued the modification. [326 IAC 2-7-12(b)(8)]

B.15 Multiple Exceedances [326 IAC 2-7-5(1)(E)]

Any exceedance of a permit limitation or condition contained in this permit, which occurs contemporaneously with an exceedance of an associated surrogate or operating parameter established to detect or assure compliance with that limit or condition, both arising out of the same act or occurrence, shall constitute a single potential violation of this permit.

B.16 Deviations from Permit Requirements and Conditions [326 IAC 2-7-5(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provisions), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within ten (10) calendar days from the date of the discovery of the deviation.

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit or a rule. It does not include:

(1) An excursion from compliance monitoring parameters as identified in Section D of this permit unless tied to an applicable rule or limit; or

(2) An emergency as defined in 326 IAC 2-7-1(12); or

(3) Failure to implement elements of the Preventive Maintenance Plan unless lack of maintenance has caused or contributed to a deviation.

(4) Failure to make or record information required by the compliance monitoring provisions of Section D unless such failure exceeds 5% of the required data in any calendar quarter.

A Permittee's failure to take the appropriate response step when an excursion of a compliance monitoring parameter has occurred is a deviation.

(c) Written notification shall be submitted on the attached Emergency/Deviation Occurrence Reporting Form or its substantial equivalent. The notification does not need to be certified by the "responsible official" as defined by 326 IAC 2-7-1(34).

(d) Proper notice submittal under 326 IAC 2-7-16 satisfies the requirement of this subsection.

B.17 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-7-5(6)(C)] [326 IAC 2-7-8(a)] [326 IAC 2-7-9]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a Part 70 permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-7-5(6)(C)]

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAM determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-7-9(a)(3)]

(c) Proceedings by IDEM, OAM to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-7-9(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-7-9(a), shall not be initiated before notice of such intent is provided to the Permittee by IDEM, OAM at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAM may provide a shorter time period in the case of an emergency. [326 IAC 2-7-9(c)]

B.18 Permit Renewal [326 IAC 2-7-4]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAM and shall include the information specified in 326 IAC 2-7-4. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-7-4(a)(1)(D)]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due. [326 IAC 2-5-3]

(2) If IDEM, OAM upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect, including any permit shield provided in 326 IAC 2-7-15, until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-7-3]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-7 until IDEM, OAM takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAM any additional information identified as being needed to process the application.

(d) United States Environmental Protection Agency Authority [326 IAC 2-7-8(e)]
If IDEM, OAM fails to act in a timely way on a Part 70 permit renewal, the U.S. EPA may invoke its authority under Section 505(e) of the Clean Air Act to terminate or revoke and reissue a Part 70 permit.

B.19 Permit Amendment or Modification [326 IAC 2-7-11] [326 IAC 2-7-12]

(a) The Permittee must comply with the requirements of 326 IAC 2-7-11 or 326 IAC 2-7-12 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application should be certified by the "responsible official" as defined by 326 IAC 2-7-1(34) only if a certification is required by the terms of the applicable rule

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-7-11(c)(3)]

B.20 Permit Revision Under Economic Incentives and Other Programs [326 IAC 2-7-5(8)] [326 IAC 2-7-12 (b)(2)]

(a) No Part 70 permit revision shall be required under any approved economic incentives, marketable Part 70 permits, emissions trading, and other similar programs or processes for changes that are provided for in a Part 70 permit.

(b) Notwithstanding 326 IAC 2-7-12(b)(1)(D)(i) and 326 IAC 2-7-12(c)(1), minor Part 70 permit modification procedures may be used for Part 70 modifications involving the use of economic incentives, marketable Part 70 permits, emissions trading, and other similar approaches to the extent that such minor Part 70 permit modification procedures are explicitly provided for in the applicable State Implementation Plan (SIP) or in applicable requirements promulgated or approved by the U.S. EPA.

B.21 Changes Under Section 502(b)(10) of the Clean Air Act [326 IAC 2-7-20(b)]

The Permittee may make Section 502(b)(10) of the Clean Air Act changes (this term is defined at 326 IAC 2-7-1(36)) without a permit revision, subject to the constraint of 326 IAC 2-7-20(a) and the following additional conditions:

(a) For each such change, the required written notification shall include a brief description of the change within the source, the date on which the change will occur, any change in emissions, and any permit term or condition that is no longer applicable as a result of the change.

(b) The permit shield, described in 326 IAC 2-7-15, shall not apply to any change made under 326 IAC 2-7-20(b).

B.22 Operational Flexibility [326 IAC 2-7-20]

(a) The Permittee may make any change or changes at the source that are described in 326 IAC 2-7-20(b), (c), or (e), without a prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-7-20(b), (c), or (e) and makes such records available, upon reasonable request, for public review.

Such records shall consist of all information required to be submitted to IDEM, OAM in the notices specified in 326 IAC 2-7-20(b), (c)(1), and (e)(2).

(b) For each such Section 502(b)(10) of the Clean Air Act change, the required written notification shall include the following:

(1) A brief description of the change within the source;

(2) The date on which the change will occur;

(3) Any change in emissions; and

(4) Any permit term or condition that is no longer applicable as a result of the change.

The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) Emission Trades [326 IAC 2-7-20(c)]
The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-7-20(c).

(d) Alternative Operating Scenarios [326 IAC 2-7-20(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-7-5(9). No prior notification of IDEM, OAM, or U.S. EPA is required.

(e) Backup fuel switches specifically addressed in, and limited under, Section D of this permit shall not be considered alternative operating scenarios. Therefore, the notification requirements of part (a) of this condition do not apply.

B.23 Construction Permit Requirement [326 IAC 2]

Except as allowed by Indiana P.L. 130-1996 Section 12, as amended by P.L. 244-1997, modification, construction, or reconstruction shall be approved as required by and in accordance with 326 IAC 2.

B.24 Inspection and Entry [326 IAC 2-7-6(2)]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, the Permittee shall allow IDEM, OAM, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a Part 70 source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) Sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) Utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements. [326 IAC 2-7-6(6)]

(1) The Permittee may assert a claim that, in the opinion of the Permittee, information removed or about to be removed from the source by IDEM, OAM or an authorized representative, contains information that is confidential under IC 5-14-3-4(a). The claim shall be made in writing before or at the time the information is removed from the source.

In the event that a claim of confidentiality is so asserted, neither IDEM, OAM nor an authorized representative, may disclose the information unless and until IDEM, OAM makes a determination under 326 IAC 17-1-7 through 326 IAC 17-1-9 that the information is not entitled to confidential treatment and that determination becomes final. [IC 5-14-3-4; IC 13-14-11-3; 326 IAC 17-1-7 through 326 IAC 17-1-9]

(2) The Permittee, and IDEM, OAM acknowledge that the federal law applies to claims of confidentiality made by the Permittee with regard to information removed or about to be removed from the source by U.S. EPA. [40 CFR Part 2, Subpart B]

B.25 Transfer of Ownership or Operation [326 IAC 2-1-6] [326 IAC 2-7-11]

Pursuant to 326 IAC 2-1-6 and 326 IAC 2-7-11:

(a) In the event that ownership of this source is changed, the Permittee shall notify IDEM, OAM, Permits Branch within thirty (30) days of the change. Notification shall include a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the Permittee and the new owner.

(b) The written notification shall be sufficient to transfer the permit to the new owner by an administrative amendment pursuant to 326 IAC 2-7-11. The notification which shall be submitted by the Permittee does not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(c) IDEM, OAM shall reserve the right to issue a new permit.

B.26 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-7-5(7)]

(a) The Permittee shall pay annual fees to IDEM, OAM, within thirty (30) calendar days of receipt of a billing. If the Permittee does not receive a bill from IDEM, OAM the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-0425 (ask for OAM, Technical Support and Modeling Section), to determine the appropriate permit fee.

B.27 Enhanced New Source Review [326 IAC 2]

The requirements of the construction permit rules in 326 IAC 2 are satisfied by this permit for any previously unpermitted facilities and facilities to be constructed within eighteen (18) months after the date of issuance of this permit, as listed in Sections A.2 and A.3.

B.28 Credible Evidence [326 IAC 2-7-5(3)][62 Federal Register 8313][326 IAC 2-7-6]

Notwithstanding the conditions of this permit that state specific methods that may be used to assess compliance or noncompliance with applicable requirements, other credible evidence may be used to demonstrate compliance or noncompliance.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emission Limitations and Standards [326 IAC 2-7-5(1)]

C.1 Particulate Matter Emission Limitations For Processes with Process Weight Rates Less Than One Hundred (100) pounds per hour [326 IAC 6-3-2(c)]

Pursuant to 326 IAC 6-3-2(c), the allowable particulate matter emissions rate from any process not already regulated by 326 IAC 6-1 or any New Source Performance Standard, and which has a maximum process weight rate less than 100 pounds per hour shall not exceed 0.551 pounds per hour.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

(a) Visible emissions shall not exceed an average of twenty percent (20%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.

(b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1. 326 IAC 4-1-3(a)(2)(A) and (B) are not federally enforceable.

C.4 Incineration [326 IAC 4-2][326 IAC 9-1-2]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions). 326 IAC 6-4-2(4) is not federally enforceable.

C.6 Fugitive Dust Emissions [326 IAC 6-1-11.1]

The Permittee shall be in violation of 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), if the opacity of fugitive particulate emissions exceeds ten percent (10%). Compliance with this opacity limit shall be achieved by controlling fugitive particulate matter emissions according to the plan submitted on September 20, 1996. The plan consists of:

(a) Routing all particulate matter emissions through vents and stacks. Therefore, there are no fugitive particulate matter emissions.

C.7 Operation of Equipment [326 IAC 2-7-6(6)]

All air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61.140]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The notifications do not require a certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

(e) Procedures for Asbestos Emission Control
The Permittee shall comply with the emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-4 emission control requirements are mandatory for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Indiana Accredited Asbestos Inspector
The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement that the inspector be accredited is federally enforceable.

Testing Requirements [326 IAC 2-7-6(1)]

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing methods approved by IDEM, OAM.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The Permittee shall submit a notice of the actual test date to the above address so that it is received at least two weeks prior to the test date.

(b) All test reports must be received by IDEM, OAM within forty-five (45) days after the completion of the testing. An extension may be granted by the Commissioner, if the source submits to IDEM, OAM, a reasonable written explanation within five (5) days prior to the end of the initial forty-five (45) day period.

The documentation submitted by the Permittee does not require certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Compliance Monitoring Requirements [326 IAC 2-7-5(1)] [326 IAC 2-7-6(1)]

C.10 Compliance Schedule [326 IAC 2-7-6(3)]

The Permittee:

(a) Has certified that all facilities at this source are in compliance with all applicable requirements; and

(b) Has submitted a statement that the Permittee will continue to comply with such requirements; and

(c) Will comply with such applicable requirements that become effective during the term of this permit.

C.11 Compliance Monitoring [326 IAC 2-7-5(3)] [326 IAC 2-7-6(1)]

Compliance with applicable requirements shall be documented as required by this permit. The Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment, no more than ninety (90) days after receipt of this permit. If due to circumstances beyond its control, this schedule cannot be met, the Permittee may extend compliance schedule an additional ninety (90) days provided the Permittee notifies:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

in writing, prior to the end of the initial ninety (90) day compliance schedule, with full justification of the reasons for the inability to meet this date.

The notification which shall be submitted by the Permittee does require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

C.12 Maintenance of Monitoring Equipment [326 IAC 2-7-5(3)(A)(iii)]

(a) In the event that a breakdown of the monitoring equipment occurs, a record shall be made of the times and reasons of the breakdown and efforts made to correct the problem. To the extent practicable, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less frequent than required in Section D of this permit until such time as the monitoring equipment is back in operation. In the case of continuous monitoring, supplemental or intermittent monitoring of the parameter should be implemented at intervals no less than one (1) hour until such time as the continuous monitor is back in operation.

(b) The Permittee shall install, calibrate, quality assure, maintain, and operate all necessary monitors and related equipment. In addition, prompt corrective action shall be initiated whenever indicated.

C.13 Monitoring Methods [326 IAC 3]

Any monitoring or testing performed to meet the applicable requirements of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, or other approved methods as specified in this permit.

C.14 Temperature Gauge Specifications

Whenever a condition in this permit requires the measurement of temperature across any part of the unit or its control device, the gauge employed shall have a scale such that the expected normal reading shall be no less than twenty percent (20%) of full scale and be accurate within plus or minus one percent (±1%) of full scale reading.

Corrective Actions and Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6]

C.15 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on December 10, 1996 with the Part 70 Permit Application.

(b) If the ERP is disapproved by IDEM, OAM the Permittee shall have an additional thirty (30) days to resolve the differences and submit an approvable ERP.

(c) These ERPs shall state those actions that will be taken, when each episode level is declared, to reduce or eliminate emissions of the appropriate air pollutants.

(d) Said ERPs shall also identify the sources of air pollutants, the approximate amount of reduction of the pollutants, and a brief description of the manner in which the reduction will be achieved.

(e) Upon direct notification by IDEM, OAM that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.16 Compliance Monitoring Plan - Failure to Take Response Steps [326 IAC 2-7-5] [326 IAC 2-7-6] [326 IAC 1-6]

(a) The Permittee is required to implement a compliance monitoring plan to ensure that reasonable information is available to evaluate its continuous compliance with applicable requirements. This compliance monitoring plan is comprised of:

(1) This condition;

(2) The Compliance Determination Requirements in Section D of this permit;

(3) The Compliance Monitoring Requirements in Section D of this permit;

(4) The Record Keeping and Reporting Requirements in Section C (Monitoring Data Availability, General Record Keeping Requirements, and General Reporting Requirements) and in Section D of this permit; and

(5) A Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. CRP's shall be submitted to IDEM, OAM upon request and shall be subject to review and approval by IDEM, OAM. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee and maintained on site, and is comprised of :

(A) Response steps that will be implemented in the event that compliance related information indicates that a response step is needed pursuant to the requirements of Section D of this permit; and

(B) A time schedule for taking such response steps including a schedule for devising additional response steps for situations that may not have been predicted.

(b) For each compliance monitoring condition of this permit, appropriate response steps shall be taken when indicated by the provisions of that compliance monitoring condition. Failure to perform the actions detailed in the compliance monitoring conditions or failure to take the response steps within the time prescribed in the Compliance Response Plan, shall constitute a violation of the permit unless taking the response steps set forth in the Compliance Response Plan would be unreasonable.

(c) After investigating the reason for the excursion, the Permittee is excused from taking further response steps for any of the following reasons:

(1) The monitoring equipment malfunctioned, giving a false reading. This shall be an excuse from taking further response steps providing that prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied or;

(3) An automatic measurement was taken when the process was not operating; or

(4) The process has already returned to operating within "normal" parameters and no response steps are required.

(d) Records shall be kept of all instances in which the compliance related information was not met and of all response steps taken. In the event of an emergency, the provisions of 326 IAC 2-7-16 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

C.17 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-7-5] [326 IAC 2-7-6]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate corrective actions. The Permittee shall submit a description of these corrective actions to IDEM, OAM, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize emissions from the affected facility while the corrective actions are being implemented. IDEM, OAM shall notify the Permittee within thirty (30) days, if the corrective actions taken are deficient. The Permittee shall submit a description of additional corrective actions taken to IDEM, OAM within thirty (30) days of receipt of the notice of deficiency. IDEM, OAM reserves the authority to use enforcement activities to resolve noncompliant stack tests.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAM that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAM may extend the retesting deadline. Failure of the second test to demonstrate compliance with the appropriate permit conditions may be grounds for immediate revocation of the permit to operate the affected facility.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

C.18 Emission Statement [326 IAC 2-7-5(3)(C)(iii)][326 IAC 2-7-5(7)][326 IAC 2-7-19(c)][326 IAC 2-6]

(a) The Permittee shall submit an annual emission statement certified pursuant to the requirements of 326 IAC 2-6, that must be received by April 15 of each year and must comply with the minimum requirements specified in 326 IAC 2-6-4. The annual emission statement shall meet the following requirements:

(1) Indicate actual emissions of criteria pollutants from the source, in compliance with 326 IAC 2-6 (Emission Reporting);

(2) Indicate actual emissions of other regulated pollutants from the source, for purposes of Part 70 fee assessment.

(b) The annual emission statement covers the twelve (12) consecutive month time period starting December 1 and ending November 30. The annual emission statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) The annual emission statement required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.

C.19 Monitoring Data Availability [326 IAC 2-7-6(1)] [326 IAC 2-7-5(3)]

(a) With the exception of performance tests conducted in accordance with Section C-Performance Testing, all observations, sampling, maintenance procedures, and record keeping, required as a condition of this permit shall be performed at all times the equipment is operating at normal representative conditions.

(b) As an alternative to the observations, sampling, maintenance procedures, and record keeping of subsection (a) above, when the equipment listed in Section D of this permit is not operating, the Permittee shall either record the fact that the equipment is shut down or perform the observations, sampling, maintenance procedures, and record keeping that would otherwise be required by this permit.

(c) If the equipment is operating but abnormal conditions prevail, additional observations and sampling should be taken with a record made of the nature of the abnormality.

(d) If for reasons beyond its control, the operator fails to make required observations, sampling, maintenance procedures, or record keeping, reasons for this must be recorded.

(e) At its discretion, IDEM may excuse such failure providing adequate justification is documented and such failures do not exceed five percent (5%) of the operating time in any quarter.

(f) Temporary, unscheduled unavailability of staff qualified to perform the required observations, sampling, maintenance procedures, or record keeping shall be considered a valid reason for failure to perform the requirements stated in (a) above.

C.20 General Record Keeping Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-6]

(a) Records of all required monitoring data and support information shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be kept at the source location for a minimum of three (3) years and available upon the request of an IDEM, OAM representative, for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner (or local agency) makes a written request for records to the Permittee, the Permittee shall furnish the records to the Commissioner or local agency within a reasonable time.

(b) Records of required monitoring information shall include, where applicable:

(1) The date, place, and time of sampling or measurements;

(2) The dates analyses were performed;

(3) The company or entity performing the analyses;

(4) The analytic techniques or methods used;
(5) The results of such analyses; and

(6) The operating conditions existing at the time of sampling or measurement.

(c) Support information shall include, where applicable:

(1) Copies of all reports required by this permit;

(2) All original strip chart recordings for continuous monitoring instrumentation;

(3) All calibration and maintenance records;

(4) Records of preventive maintenance shall be sufficient to demonstrate that improper maintenance did not cause or contribute to a violation of any limitation on emissions or potential to emit. To be relied upon subsequent to any such violation, these records may include, but are not limited to: work orders, parts inventories, and operator's standard operating procedures. Records of response steps taken shall indicate whether the response steps were performed in accordance with the Compliance Response Plan required by Section C - Compliance Monitoring Plan - Failure to take Response Steps, of this permit, and whether a deviation from a permit condition was reported. All records shall briefly describe what maintenance and response steps were taken and indicate who performed the tasks.

(d) All record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.21 General Reporting Requirements [326 IAC 2-7-5(3)(C)]

(a) To affirm that the source has met all the compliance monitoring requirements stated in this permit the source shall submit a Quarterly Compliance Monitoring Report. Any deviation from the requirements and the date(s) of each deviation must be reported.

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Management
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAM on or before the date it is due.

(d) Unless otherwise specified in this permit, any quarterly report shall be submitted within thirty (30) days of the end of the reporting period.

(e) All instances of deviations as described in Section B- Deviations from Permit Requirements Conditions must be clearly identified in such reports.

(f) Any corrective actions or response steps taken as a result of each deviation must be clearly identified in such reports.

(g) The first report shall cover the period commencing on the date of issuance of this permit and ending on the last day of the reporting period.

The documents submitted pursuant to this condition do not require the certification by the "responsible official" as defined by 326 IAC 2-7-1(34).

Stratospheric Ozone Protection

C.22 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156.

(b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]
(1) Two (2) packaging rotogravure printing press, installed in 1974 and 1985, identified as C-7 and C-10, and one (1) Pilot packaging rotogravure printing press, installed in 1995, identified as Texmac, all controlled by one (1) 11.2 million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer, exhausting to two (2) stacks (C-7A and C-7B);
(2) One (1) packaging rotogravure printing press, installed in 1985, identified as C-8, controlled by one (1) 9.0 million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer, exhausting to one (1) stack (C-8);

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.1.1 Graphic Arts Operations [326 IAC 8-5-5]

(a) The Permittee may not cause, allow, or permit the operation of the facility unless the Permittee installs and operates an incineration system(s) that oxidizes at least ninety percent (90%) of the nonmethane volatile organic compounds (volatile organic compounds measured as total combustible carbon) to carbon dioxide and water.

(b) A capture system must be used in conjunction with each emission control system. The capture system shall attain an efficiency sufficient to achieve an overall control efficiency, in conjunction with the emission control system, of sixty-five percent (65%) for packaging rotogravure processes.

(c) The thermal oxidizing incinerator for two (2) rotogravure printing presses identified as C-7 and C-10 and one (1) pilot packaging rotogravure printing press, identified as Texmac shall maintain a minimum operating temperature of 1,400 ^{o}F or a temperature, fan amperage and duct velocity determined in the compliance tests (described in Condition D.1.8) to maintain a minimum 90% overall destruction of the nonmethane VOC captured.

(d) The thermal oxidizing incinerator for one (1) packaging rotogravure printing press, identified as C-8, shall maintain a minimum operating temperature of 1,400 ^{o}F or a temperature, fan amperage and duct velocity determined in the compliance tests (described in Condition D.1.8) to maintain a minimum 90% overall destruction of the nonmethane VOC captured.

D.1.2 Compliance Certification, Record Keeping and Reporting Requirements for Certain Coating Facilities Using Control Devices [326 IAC 8-1-12]

326 IAC 8-1-12 applies only to facilities that use control devices to comply with 326 IAC 8-5-5.

(a) Each incineration control system shall be operated and maintained according to the manufacturer's recommendations but may be modified based on the results of the initial or subsequent compliance test or upon the written request of IDEM, OAM.

(b) A copy of the operating and maintenance procedures shall be maintained in a convenient location at the source property and as close to each control system as possible for reference by plant personnel and IDEM, OAM inspectors.

D.1.3 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR Part 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart KK.

D.1.4 Printing and Publishing Industry NESHAP [326 IAC 20-18-1] [40 CFR 63, Subpart KK]

This facility is subject to 40 CFR 63, Subpart KK, which is incorporated by reference as 326 IAC 20-18-1. A copy of the rule is attached. The Permittee shall comply with all applicable provisions of this rule on and after May 30, 1999.

(a) The four (4) packaging rotogravure printing presses (C-7, C-10, C-8, and Texmac) shall limit emissions to no more than five (5) percent of the organic HAP applied for the month.

(b) The Permittee shall demonstrate compliance with this standard by operating capture systems and control devices and demonstrating an overall organic HAP control efficiency of at least ninety-five (95) percent for each month. The Permittee shall show compliance by demonstrating:

(1) Initial compliance through performance tests of capture efficiency and control device efficiency following the procedures in Condition D.1.8; and

(2) Continuing compliance through continuous monitoring of capture system and control device operating parameters following the procedures in Condition D.1.10.

(c) The facility is in compliance with the ninety-five (95) percent overall organic HAP control efficiency requirement for the month if for each press or group of presses controlled by a common control device:

(1) The overall organic HAP control efficiency as determined by the procedures in Condition D.1.8 for each press or group of presses served by that control device and a common capture system is equal to or greater than ninety-five (95) percent;

(2) The oxidizer is operated such that the average combustion temperature is greater than the minimum combustion temperature established in accordance with the provisions of Condition D.1.10 for each three (3) hour period; and

(3) The average capture system operating parameter value for each capture system serving that control device is greater than or less than (as appropriate) the operating parameter value established for that capture system in accordance with the provisions of Condition D.1.10 for each three (3) hour period.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for each facility and the control devices.

D.1.6 Startup, Shutdown, and Malfunction Plan [40 CFR 63.6(e)(3) General Provisions]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall develop and implement a written startup, shutdown, and malfunction (SSM) plan that describes, in detail, procedures for operating and maintaining the facility during periods of startup, shutdown, and malfunction and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with 40 CFR 63, Subpart KK. As required under 40 CFR 63.8(c)(1)(i) (General Provisions), the plan shall identify all routine or otherwise predictable continuous monitoring system (CMS) malfunctions. This plan shall be developed by the Permittee by the facility's compliance date, May 30, 1999. The plan shall be incorporated by reference into the source's Part 70 permit.

(a) The purpose of the SSM plan is to –

(1) Ensure that, at all times, the Permittee operates and maintains the facility, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the level required by the rule;

(2) Ensure that the Permittee is prepared to correct malfunctions as soon as practicable after their occurrence in order to minimize excess emissions of HAP; and

(3) Reduce the reporting burden associated with periods of startup, shutdown, and malfunction (including corrective action taken to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation).

(b) During periods of startup, shutdown, and malfunction, the Permittee shall operate and maintain the facility (including associated air pollution control equipment) in accordance with the procedures specified in the SSM plan developed under this condition.

(c) Recordkeeping associated with the SSM plan is identified in Condition D.1.12. Reporting associated with the SSM plan is identified in Condition D.1.14.

(d) The Permittee shall keep the written SSM plan on record after it is developed to be made available for inspection, upon request, by IDEM, OAM for the life of the facility or until the facility is no longer subject to this rule. In addition, if the SSM plan is revised, the Permittee shall keep previous (i.e., superseded) versions of the SSM plan on record, to be made available for inspection, upon request, by IDEM, OAM, for a period of 5 years after each revision to the plan. Revisions to the SSM plan are automatically incorporated by reference and do not require a permit revision.

(e) To satisfy the requirements of this condition, the Permittee may use the facility's standard operating procedures (SOP) manual, or an Occupational Safety and Health Administration (OSHA) or other plan, provided the alternative plans meet all the requirements of this condition and are made available for inspection when requested by IDEM, OAM.

(f) IDEM, OAM shall determine whether acceptable operation and maintenance procedures are being used, based on information available to IDEM, OAM, which may include, but is not limited to, monitoring results, review of operation and maintenance procedures (including the SSM plan required in this condition), review of operation and maintenance records, and inspection of the facility.

Based on the results of such determination, IDEM, OAM may require that the Permittee make changes to the SSM plan for the facility. IDEM, OAM may require reasonable revisions to a SSM plan, if IDEM, OAM finds that the plan:

(1) Does not address a startup, shutdown, or malfunction event that has occurred;

(2) Fails to provide for the operation of the facility (including associated air pollution control equipment) during a startup, shutdown, or malfunction event in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards; or

(3) Does not provide adequate procedures for correcting malfunctioning process and/or air pollution control equipment as quickly as practicable.

(g) If the SSM plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction but was not included in the SSM plan at the time the Permittee developed the plan, the Permittee shall revise the SSM plan within forty-five (45) days after the event to include detailed procedures for operating and maintaining the facility during similar malfunction events and a program of corrective action for similar malfunctions of process or air pollution control equipment.

Compliance Determination Requirements

D.1.7 Testing Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-1-12, each incineration control system shall be tested according to the following schedule and in the following situations:

(a) Compliance tests shall be conducted no later than every thirty (30) months after the date of the initial test required when the control system became subject to this rule.

(b) A compliance test shall be conducted whenever the Permittee chooses to operate a control system under conditions different from those that were in place at the time of the previous test.

(c) A compliance test shall be performed within ninety (90) days of:

(1) Startup of a new coating facility;

(2) Changing the method of compliance for an existing coating facility from compliance coatings or daily-weighted averaging to control devices; or

(3) Receipt of a written request from IDEM, OAM or U.S. EPA.

(d) All compliance tests shall be conducted according to a protocol approved by IDEM, OAM at least thirty (30) days before the test. The protocol shall contain, at a minimum, the following information:

(1) Test procedures.

(2) Operating and control system parameters.

(3) Type of VOC containing process material being used.

(4) The process and control system parameters that will be monitored during the test.

D.1.8 Testing Requirements [40 CFR 63.827]

Pursuant to the Printing and Publishing Industry NESHAP, initial compliance with the ninety-five (95) percent overall organic HAP control efficiency requirement in Condition D.1.4 shall be demonstrated for each thermal oxidizer within 180 days after May 30, 1999 in accordance with the following:

(a) Determine the oxidizer destruction efficiency (E) using the following procedure:

(1) An initial performance test to establish the destruction efficiency and the associated combustion zone temperature for each oxidizer shall be conducted and the data reduced in accordance with the following reference methods and procedures:

(i) Method 1 or 1A of 40 CFR 60, Appendix A is used for sample and velocity traverses to determine sampling locations.

(ii) Method 2, 2A, 2C, or 2D of 40 CFR 60, Appendix A is used to determine gas volumetric flow rate.

(iii) Method 3 of 40 CFR 60, Appendix A is used for gas analysis to determine dry molecular weight.

(iv) Method 4 of 40 CFR 60, Appendix A is used to determine stack gas moisture.

(v) Methods 2, 2A, 3, and 4 of 40 CFR 60, Appendix A shall be performed, as applicable, at least twice during each test period.

(vi) Method 25 of 40 CFR 60, Appendix A, shall be used to determine organic volatile matter concentration, except as provided in (A) through (C) below. The Permittee shall submit notice of the intended test method to IDEM, OAM for approval along with notice of performance test required under 40 CFR 63.7(c) (General Provisions). The Permittee may use Method 25A of 40 CFR 60, Appendix A, if:

(A) An exhaust gas organic volatile matter concentration of 50 parts per million by volume (ppmv) or less is required to comply with Condition D.1.4, or

(B) The organic volatile matter concentration at the inlet to the control system and the required level of control are such to result in exhaust gas organic volatile matter concentrations of 50 ppmv or less, or

(C) Because of the high efficiency of the control device, the anticipated organic volatile matter concentration at the control device exhaust is 50 ppmv or less, regardless of inlet concentration.

(vii) Each performance test shall consist of three separate runs; each run conducted for at least one hour under the conditions that exist when the affected source is operating under normal operating conditions. For the purpose of determining organic volatile matter concentrations and mass flow rates, the average of results of all runs shall apply.

(viii) Organic volatile matter mass flow rates shall be determined using the following equation:

$$M_f = Q_{sd} \left[\sum_{i=1}^{n} C_i M W_i \right] [0.0416] [10^{-6}]$$

where the symbols of this equation are defined in 40 CFR 63.822 (Definitions) of the rule, a copy of which is attached to this permit.

(ix) Emission control device efficiency shall be determined using the following equation:

$$E = [M_{fi} - M_{fo}] / M_{fi}$$

(2) The Permittee shall record such process information as may be necessary to determine the conditions of the performance test. Operations during periods of start-up, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test.

(3) For the purpose of determining the value of the oxidizer operating parameter that will demonstrate continuing compliance, the time-weighted average of the values recorded during the performance test shall be computed. The Permittee shall establish as the operating parameter the minimum combustion temperature. These minimum temperatures are the operating parameter values that demonstrate continuing compliance with the requirements of Condition D.1.4.

(b) Determine the capture system capture efficiency (F) of each capture system venting organic emissions to a control device for the purposes of meeting the requirements of Condition D.1.4 by conducting a performance test. For permanent total enclosures, capture efficiency shall be assumed as 100 percent. Procedure T – Criteria for and Verification of a Permanent or Temporary Total Enclosure as found in 40 CFR 52.741, Appendix B shall be used to confirm that an enclosure meets the requirements for permanent total enclosure.

(c) Calculate the overall organic HAP control efficiency, (R), achieved using the following equation:

R = EF / 100

where E and F are determined according to paragraphs (a) and (b) of this condition.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.9 Monitoring Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-1-12, a temperature monitoring device capable of continuously recording the temperature of the gas stream in the combustion zone of each incinerator shall be used. The temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees Centigrade, or plus or minus five-tenths degree Centigrade (± 0.5 °C), whichever is more accurate.

D.1.10 Monitoring Requirements [40 CFR 63.828]

Pursuant to the Printing and Publishing Industry NESHAP, following the date on which the initial performance test of each control device is completed, to demonstrate continuing compliance with the standard, the Permittee shall monitor and inspect each control device required to comply with Condition D.1.4 to ensure proper operation and maintenance by implementing the following requirements:

(a) For the oxidizers, the Permittee shall install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device shall have an accuracy of ±1 percent of the temperature being monitored in °C or ±1 °C, whichever is greater. The thermocouple or temperature sensor shall be installed in the combustion chamber at a location in the combustion zone.

(b) All temperature monitoring equipment shall be installed, calibrated, maintained, and operated according to manufacturers' specifications. The calibration of the chart recorder, data logger, or temperature indicator shall be verified every three months; or the chart recorder, data logger, or temperature indicator shall be replaced. The replacement shall be done either if the Permittee chooses not to perform the calibration, or if the equipment cannot be calibrated properly.

(c) To demonstrate continuous compliance by monitoring an operating parameter to ensure that the capture efficiency measured during the initial compliance test is maintained, the Permittee shall:

(1) Submit to IDEM, OAM with the compliance status report required in Condition D.1.14(b), a plan that:

(i) Identifies the operating parameter to be monitored to ensure that the capture efficiency measured during the initial compliance test is maintained;

(ii) Discusses why this parameter is appropriate for demonstrating ongoing compliance; and

(iii) Identifies the specific monitoring procedures.

(2) Set the operating parameter value, or range of values, that demonstrate compliance with Condition D.1.4; and

(3) Conduct monitoring in accordance with the plan submitted to IDEM, OAM unless comments received from IDEM, OAM require an alternate monitoring scheme.

(d) Any excursion from the required operating parameters that are monitored in accordance with this condition, unless otherwise excused, shall be considered a violation of Condition D.1.4.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.11 Record Keeping Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-1-12, the Permittee shall collect and record each day for each coating facility:

(a) The name and identification of each coating used at each coating facility.

(b) The mass of VOC per unit volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating expressed in units necessary to determine compliance, used each day at each coating facility.

(c) The maximum VOC content (mass of VOC per unit volume of coating solids, as applied) or the daily weighted average VOC content (mass of VOC per unit volume of coating solids, as applied) of the coatings used each day on each coating facility.

(d) The required overall emission reduction efficiency for each day for each coating facility.

(e) The actual overall emission reduction efficiency achieved for each day for each coating facility as determined during the compliance test required by Condition D.1.7.

(f) Control device monitoring data as follows:

(1) Continuous records of the temperature in the gas stream in the combustion zone of each incinerator.

(2) Records of all three (3) hour periods of operation in which the average combustion temperature of the gas stream in each combustion zone was more than fifty degrees Fahrenheit (50 °F) (twenty-eight degrees Centigrade (28 °C)) below the average combustion temperature that existed during the most recent test that demonstrated that the coating facility was in compliance.

(g) A log of operating time for each capture system, control device, monitoring equipment, and the associated coating facility.

(h) A maintenance log for each capture system, control device, and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages.

(i) The records required in paragraphs (a) through (h) of this condition shall be maintained in accordance with the requirements of Condition C.20 and 326 IAC 8-1-9(c).

D.1.12 Record Keeping Requirements [40 CFR 63.829]

(a) Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall maintain the following records on a monthly basis:

(1) Records of all measurements needed to demonstrate compliance with Condition D.1.4. These records shall include at a minimum the following specified in 40 CFR 63.10(b)(2) (General Provisions) that are applicable:

(i) The occurrence and duration of each startup, shutdown, or malfunction of operation (i.e., process equipment);

(ii) The occurrence and duration of each malfunction of the air pollution control equipment;

(iii) All maintenance performed on the air pollution control equipment;

(iv) Actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) when such actions are different from the procedures specified in the SSM plan required by Condition D.1.6;

(v) All information necessary to demonstrate conformance with the SSM plan required in Condition D.1.6 when all actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan. (The information needed to demonstrate conformance with the SSM plan may be recorded using a “checklist”, or some other effective form or recordkeeping, in order to minimize the recordkeeping burden for conforming events);

(vi) Each period during which a continuous monitoring system (CMS) is malfunctioning or inoperative (including out-of-control periods);

(vii) All required measurements needed to demonstrate compliance with Condition D.1.4 (including, but not limited to, 15-minute averages of CMS data, raw performance testing measurements, raw performance evaluation measurements, and control device and capture system operating parameter data, that support data that the source is required to report);

(viii) All results of performance tests and CMS performance evaluations;

(ix) All measurements as may be necessary to determine the conditions of performance tests and performance evaluations;

(x) All CMS calibration checks;

(xi) All adjustments and maintenance performed on CMS;

(xii) All documentation supporting initial notifications of compliance status under 40 CFR 63.9 (General Provisions).

(2) Records for each applicability determination performed by the Permittee in accordance with the requirements of 40 CFR 63.820(a) of this rule. The records and conditions for recordkeeping are specified in 40 CFR 63.10(b)(3) (General Provisions) and are as follows:

(i) If the Permittee determines that their stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants is not subject to 40 CFR 63, Subpart KK, the Permittee shall keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first.

(ii) The record of the applicability determination shall include an analysis (or other information) that demonstrates why the Permittee believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) shall be sufficiently detailed to allow IDEM, OAM to make a finding about the source's applicability status with regard to the relevant standard or other requirement.

(iii) If relevant, the analysis shall be performed in accordance with requirements established in this rule for this purpose. If relevant, the analysis should be performed in accordance with EPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Federal Clean Air Act, if any.

(3) Records for each CMS operated by the Permittee in accordance with the requirements of Condition D.1.10. These records are in addition to complying with the requirements specified in paragraph (a)(1) of this condition, and shall include at a minimum the following specified in 40 CFR 63.10(c) (General Provisions) that are applicable:

(i) All required CMS measurements (including monitoring data recorded during unavoidable CMS breakdowns and out-of-control periods);

(ii) The date and time identifying each period during which the CMS was inoperative except for zero (low-level) and high-level checks;

(iii) The date and time identifying each period during which the CMS was out of control, as defined in 40 CFR 63.8(c)(7) (General Provisions);

(iv) The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions and parameter monitoring exceedances, as defined in the rule, that occurs during startups, shutdowns, and malfunctions of the facility;

(v) The specific identification (i.e., the date and time of commencement and completion) of each time period of excess emissions and parameter monitoring exceedances, as defined in the rule, that occurs during periods other than startups, shutdowns, and malfunctions of the facility;

(vi) The nature and cause of any malfunction (if known);

(vii) The corrective action taken or preventive measures adopted;

(viii) The nature of the repairs or adjustments to the CMS that was inoperative or out of control;

(ix) The total process operating time during the reporting period; and

(x) All procedures that are part of a quality control program developed and implemented for CMS under 40 CFR 63.8(d) (General Provisions).

(xi) In order to satisfy the requirements of paragraphs (vi) through (viii) of this condition and to avoid duplicative recordkeeping efforts, the Permittee may use the SSM plan or records kept to satisfy the recordkeeping requirements of the SSM plan specified in Condition D.1.6, provided that such plan and records adequately address the requirements of paragraphs (vi) through (viii) of this condition.

(b) The records required in paragraph (a) of this condition shall be maintained in accordance with the following requirements of 40 CFR 63.10(b)(1) (General Provisions):

(1) The Permittee shall maintain files of all information (including all reports and notifications) required by this rule recorded in a form suitable and readily available for expeditious inspection and review.

(2) The files shall be retained for at least five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two years of data shall be retained on site. The remaining three years of data may be retained off site.

(3) Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

D.1.13 Reporting Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-1-12, the Permittee shall notify IDEM, OAM in either of the following instances:

(a) Any record showing noncompliance with the applicable requirements for control devices shall be reported by submitting a copy of the record to IDEM, OAM within thirty (30) days following noncompliance; such record shall also be submitted with the quarterly compliance monitoring report attached to this permit. The following information shall accompany each submittal:

(1) Name and location of the coating facility.

(2) Identification of the control system where the noncompliance occurred and the coating facility it served.

(3) Time, date and duration of the noncompliance.

(4) Corrective action taken.

(b) At least thirty (30) calendar days before changing the method of compliance from control devices to the use of compliant coatings or daily-weighted averaging, the Permittee shall comply with all applicable requirements of 326 IAC 8-1-10(b) or 8-1-11(b), respectively. Upon changing the method of compliance from control devices to the use of compliant coatings or daily-weighted averaging, the Permittee shall comply with all requirements of 326 IAC 8-1-10(b) or 8-1-11(b), respectively, applicable to the coating facility subject to 326 IAC 8-5-5.

D.1.14 Reporting Requirements [40 CFR 63.830]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall submit the reports and plans listed below to the following addresses:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

(a) A Notification of Performance Tests specified in 40 CFR 63.7 and 63.9(e) (General Provisions). This notification, and the site-specific test plan required under 40 CFR 63.7(c)(2) (General Provisions) shall identify the operating parameter to be monitored to ensure that the capture efficiency measured during the performance test is maintained. The operating parameter identified in the site-specific test plan shall be considered to be approved unless explicitly disapproved, or unless comments received from IDEM, OAM require monitoring of an alternate parameter.

(b) A Notification of Compliance Status specified in 40 CFR 63.9(h) (General Provisions).

(c) Performance test reports specified in 40 CFR 63.10(d)(2) (General Provisions).

(d) Start-up, shutdown and malfunction (SSM) reports specified in 40 CFR 63.10(d)(5) (General Provisions).

(i) If actions taken by the Permittee during a start-up, shutdown, or malfunction of the facility (including actions taken to correct a malfunction) are not completely consistent with the procedures specified in the facility's SSM plan specified in Condition D.1.6, the Permittee shall report the actions taken for that event in strict accordance with 40 CFR 63.10(d)(5)(ii), i.e., within two (2) working days after commencing actions inconsistent with the plan, followed by a letter within seven (7) working days after the end of the event. The SSM report shall consist of a letter containing the name, title, and signature of the responsible official who is certifying its accuracy; shall be submitted to IDEM, OAM; and shall otherwise comply with the provisions of 40 CFR 63.10(d)(5)(ii).

(ii) Separate start-up, shutdown, or malfunction reports are not required if the information is included in the report specified in paragraph (e) of this condition.

(e) A summary report specified in 40 CFR 63.10(e)(3) (General Provisions) shall be submitted on a semi-annual basis (i.e., once every six-month period). In addition to a report of operating parameter exceedances as required by 40 CFR 63.10(e)(3)(i) (General Provisions), the summary report shall include exceedances of the standard in Condition D.1.4.

(f) The monitoring plan required in Condition D.1.10(c), to ensure continuous capture efficiency compliance, submitted with the compliance status report required in paragraph (b) of this condition.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]

(3) One (1) lacquer production area, consisting of the following equipment:
- (A) Two (2) mixers, installed in 1974, identified as 700, each with maximum capacity of thirty (30) horsepower;
- (B) One (1) mixer, installed in 1993, identified as 709, with maximum capacity of five (5) horsepower;
- (C) One (1) mixer, installed in 1993, identified as 711, with maximum capacity of ten (10) horsepower;
- (D) One (1) mill, installed in 1974, identified as 702, with maximum capacity of seventy-five (75) horsepower;
- (E) Two (2) mixers, installed in 1993, identified as 713 and 714, each with maximum capacity of thirty (30) horsepower;
- (F) One (1) ER mixer tank, installed in 1993, identified as 710, with maximum capacity of ten (10) horsepower;
- (G) One (1) GM mixer tank, installed in 1993; and
- (H) Two (2) sandmills, installed in 1993, identified as 802 and 803.
- (I) Two (2) Schold mixers to be located in the Production Area, with maximum capacity of thirty (30) horsepower.

(4) One (1) pigment production homogenizer tub, installed in 1974, identified as PP-2; and

THIS SECTION OF THE PERMIT IS BEING ISSUED UNDER THE PROVISIONS OF 326 IAC 2-1 AND 40 CFR 52.780, WITH CONDITIONS LISTED BELOW.

Construction Conditions [326 IAC 2-1-3.2] for the two (2) new Schold 30 HP mixers (Item I)

General Construction Conditions

D.2.1 This permit to construct does not relieve the Permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.

Effective Date of the Permit

D.2.2 Pursuant to IC 13-15-5-3, this section of this permit becomes effective upon its issuance.

D.2.3 Pursuant to 326 IAC 2-1-9(b) (Revocation of Permits), IDEM, OAM, may revoke this section of the approved permit if construction is not commenced within eighteen (18) months after receipt of this permit or if construction is suspended for a continuous period of one (1) year or more.

D.2.4 All requirements of these construction conditions shall remain in effect unless modified in a manner consistent with procedures established for modifications of construction permits pursuant to 326 IAC 2 (Permit Review Rules).

First Time Operation Permit

D.2.5 This document shall also become the first-time operation permit for the facilities under this section of this permit, pursuant to 326 IAC 2-1-4 (Operating Permits) when, prior to start of operation, the following requirements are met:

The attached affidavit of construction shall be submitted to:

Indiana Department of Environmental Management
Permit Administration & Development Section, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

verifying that the facilities were constructed as proposed in the application. The facilities covered in this section of this permit may begin operating on the date the Affidavit of Construction is postmarked or hand delivered to IDEM.

(a) If construction is completed in phases; i.e., the entire construction is not done continuously, a separate affidavit must be submitted for each phase of construction. Any permit conditions associated with operation start up dates such as stack testing for New Source Performance Standards (NSPS) shall be applicable to each individual phase.

(b) The permittee shall receive an Operation Permit Validation Letter from the Chief of the Permit Administration & Development Section and attach it to this permit.

Operation Conditions

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.2.6 Volatile Organic Compound (VOC) [326 IAC 8-1-6]

Pursuant to CP 089-3522-00062, issued August 11, 1995:

(a) The pigment produced by the pigment stripper shall be limited to 96.5 tons per 12 month period, rolled on a monthly basis. This is equivalent to volatile organic compound (VOC) potential to emit (PTE) of twenty-four (24) tons per 12 month period. Therefore, the facility will not be subject to the requirements of 326 IAC 8-1-6 (General Reduction Requirements).

(b) The amount of lacquer ingredients mixed in the lacquer production mixers shall be limited to 75,000 tons per 12 month period, rolled on a monthly basis. This is equivalent to volatile organic compound (VOC) potential to emit (PTE) of twenty-four (24) tons per 12 month period. Therefore, the facility will not be subject to the requirements of 326 IAC 8-1-6 (General Reduction Requirements). This limitation includes the two (2) new Schold mixers.

(c) These limitations will also make 326 IAC 2-3 (Emission Offset) not applicable.

D.2.7 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities.

Compliance Determination Requirements

D.2.8 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Volatile Organic Compound (VOC) limit specified in Condition D.2.6 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.2.9 Monitoring

Monitoring of this facility is not specifically required by this permit. However, any change or modification to this facility, as specified in 326 IAC 2-1 may require this facility to have monitoring requirements.

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.2.10 Record Keeping Requirements

(a) To document compliance with Condition D.2.6(a), the Permittee shall maintain monthly records of pigment produced by the pigment stripper.

(b) To document compliance with Condition D.2.6(b), the Permittee shall maintain monthly records of the amount of lacquer ingredients mixed in the lacquer production mixers.

D.2.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.6 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)] (5) One (1) hazardous waste above ground storage tank, installed in 1985, with maximum storage capacity of 6,000 gallons. (Insignificant Activity) Seven (7) volatile organic liquid storage tanks, each with maximum storage capacity of 3,000 gallons;

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Volatile Organic Compounds (VOCs) [326 IAC 8-9]

Any change or modification to these facilities that would increase potential volatile organic compound (VOC) emissions, as specified in 326 IAC 2-1, must be approved by the Office of Air Management (OAM) before such change or modification can occur.

Compliance Determination Requirements

D.3.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Volatile Organic Compound (VOC) limit specified in Condition D.3.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.3 Monitoring

Monitoring of this facility is not specifically required by this permit. However, any change or modification to this facility, as specified in 326 IAC 2-1 may require this facility to have monitoring requirements.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.4 Record Keeping Requirements

Pursuant to 326 IAC 8-9-6(a) and (b), the Permittee shall keep the following records for life of the vessel:

(a) The vessel identification number.

(b) The vessel dimensions.

(c) The vessel capacity.

SECTION D.4 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]	
(Insignificant Activity)	One (1) natural gas fired boiler, constructed in 1986, identified as F, with maximum heat input capacity of 5.25 million British thermal units per hour.

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.4.1 Particulate Matter (PM) [326 IAC 6-2-4]

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the particulate matter emissions from the 5.25 million British thermal unit per hour natural gas fired boiler constructed in 1986, shall be limited to 0.6 pounds per million British thermal unit heat input. This limit is calculated by the following equation:

$$Pt = 1.09 / Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million Btu (lb/mmBtu) heat input.

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

Compliance Determination Requirement

D.4.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the Particulate Matter (PM) limit specified in Condition D.4.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.4.3 Monitoring

Monitoring of this facility is not specifically required by this permit. However, any change or modification to this facility, as specified in 326 IAC 2-1 may require this facility to have monitoring requirements.

SECTION D.5 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]	
(Insignificant Activity)	Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6;

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.5.1 Volatile Organic Compounds (VOC) [326 IAC 8-3-2] [326 IAC 8-3-5]

Compliance with these requirements will also satisfy the requirements of 326 IAC 8-3-2 (Cold Cleaner Degreaser Operation):

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120^{O}F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.
(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

Compliance Determination Requirement

D.5.2 Testing Requirements [326 IAC 2-7-6(1),(6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.5.3 Monitoring

Monitoring of this facility is not specifically required by this permit. However, any change or modification to this facility, as specified in 326 IAC 2-1 may require this facility to have monitoring requirements.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT CERTIFICATION

Source Name: Avery Dennison MFD
Source Address: 650 West 67th Avenue, Schererville, Indiana 46375-1390
Mailing Address: 650 West 67th Avenue, Schererville, Indiana 46375-1390
Part 70 Permit No.: T089-7441-00062

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

Signature:

Printed Name:

Title/Position:

Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT

COMPLIANCE DATA SECTION
P.O. Box 6015
100 North Senate Avenue
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

PART 70 OPERATING PERMIT
EMERGENCY/DEVIATION OCCURRENCE REPORT

Source Name: Avery Dennison
Source Address: 650 West 67th Avenue, Schererville, Indiana 46375-1390
Mailing Address: 650 West 67th Avenue, Schererville, Indiana 46375-1390
Part 70 Permit No.: T089-7441-00062

This form consists of 2 pages **Page 1 of 2**

Check either No. 1 or No.2
9 1. This is an emergency as defined in 326 IAC 2-7-1(12) C The Permittee must notify the Office of Air Management (OAM), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and C The Permittee must submit notice in writing or by facsimile within two (**2**) days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16
9 2. This is a deviation, reportable per 326 IAC 2-7-5(3)(c) C The Permittee must submit notice in writing within ten (**10**) calendar days

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency/Deviation:
Describe the cause of the Emergency/Deviation:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency/Deviation started:
Date/Time Emergency/Deviation was corrected:
Was the facility being properly operated at the time of the emergency/deviation? Y N Describe:
Type of Pollutants Emitted: TSP, PM-10, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency/deviation:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____
Title / Position: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

Part 70 Quarterly Report

Source Name: Avery Dennison MFD
Source Address: 650 West 67th Avenue, Schererville, Indiana 46375-1390
Mailing Address: 650 West 67th Avenue, Schererville, Indiana 46375-1390
Part 70 Permit No.: T089-7441-00062
Facility: pigment production and lacquer production
Parameter: Volatile Organic Compound (VOC)
Limit: The pigment produced by the pigment stripper shall be limited to 96.5 tons per 12 month period, rolled on a monthly basis. The amount of lacquer ingredients mixed in the lacquer production mixers shall be limited to 75,000 tons per 12 month period, rolled on a monthly basis. This is equivalent to volatile organic compound (VOC) potential to emit (PTE) of twenty-four (24) tons per 12 month period for each facility.

YEAR: _____

Month	Pigment Usage this month (tons)	Pigment Usage past 11 months (tons)	Pigment Usage past 12 months (tons)	Lacquer Usage this month (tons)	Lacquer Usage past 11 months (tons)	Lacquer Usage past 12 months (tons)

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION

PART 70 OPERATING PERMIT
QUARTERLY COMPLIANCE MONITORING REPORT

Source Name: Avery Dennison MFD
Source Address: 650 West 67th Avenue, Schererville, Indiana 46375-1390
Mailing Address: 650 West 67th Avenue, Schererville, Indiana 46375-1390
Part 70 Permit No.: T089-7441-00062

Months: _____ to _____ Year: _____

This report is an affirmation that the source has met all the compliance monitoring requirements stated in this permit. This report shall be submitted quarterly. Any deviation from the compliance monitoring requirements and the date(s) of each deviation must be reported. Additional pages may be attached if necessary. This form can be supplemented by attaching the Emergency/Deviation Occurrence Report. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD.

Compliance Monitoring Requirement (e.g. Permit Condition D.1.3)	**Number of Deviations**	**Date of each Deviation**

Form Completed By: _____
Title/Position: _____
Date: _____
Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Management

Technical Support Document (TSD) for a Part 70 Operating Permit and Enhanced New Source Review (ENSR)

Source Background and Description

Source Name:	Avery Dennison MFD
Source Location:	650 West 67th Avenue, Schererville, Indiana 46375-1390
County:	Lake
SIC Code:	2754, 2816, 2851
Operation Permit No.:	T089-7441-00062
Permit Reviewer:	Cathie Moore

The Office of Air Management (OAM) has reviewed a Part 70 permit application from Avery Dennison MFD relating to the operation of commercial gravure printing and pigment and lacquer manufacturing operation.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(1) Two (2) packaging rotogravure printing press, installed in 1974 and 1985, identified as C-7 and C-10, and one (1) Pilot packaging rotogravure printing press, installed in 1995, identified as Texmac, all controlled by one (1) 11.2 million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer, exhausting to two (2) stacks (C-7A and C-7B);

(2) One (1) packaging rotogravure printing press, installed in 1985, identified as C-8, controlled by one (1) 9.0 million British thermal units per hour (mmBtu/hr) natural gas fired thermal oxidizer, exhausting to one (1) stack (C-8);

(3) One (1) lacquer production area, consisting of the following equipment:

(A) Two (2) mixers, installed in 1974, identified as 700, each with maximum capacity of thirty (30) horsepower;

(B) One (1) mixer, installed in 1993, identified as 709, with maximum capacity of five (5) horsepower;

(C) One (1) mixer, installed in 1993, identified as 711, with maximum capacity of ten (10) horsepower;

(D) One (1) mill, installed in 1974, identified as 702, with maximum capacity of seventy-five (75) horsepower;

(E) Two (2) mixers, installed in 1993, identified as 713 and 714, each with maximum capacity of thirty (30) horsepower;

(F) One (1) ER mixer tank, installed in 1993, identified as 710, with maximum capacity of ten (10) horsepower;

(G) One (1) GM mixer tank, installed in 1993; and

(H) Two (2) sandmills, installed in 1993, identified as 802 and 803.

(4) One (1) pigment production homogenizer tub, installed in 1974, identified as PP-2; and

(5) One (1) hazardous waste above ground storage tank, installed in 1985, with maximum storage capacity of 6,000 gallons.

Unpermitted Emission Units and Pollution Control Equipment Requiring ENSR

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Requiring ENSR

The application includes information relating to the construction and operation of the following equipment:

(1) Two (2) Schold mixers to be located in the Production Area, with maximum capacity of thirty (30) horsepower.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(1) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) Btu per hour;

(2) Degreasing operations that do not exceed 145 gallons per 12 months, except if subject to 326 IAC 20-6;

(3) Cleaners and solvents characterized as follows:
A) having a vapor pressure equal to or less than 2 kPa, 15mm Hg, or 0.3 psi measured at 38 degrees C (100 degrees F) or;
B) having a vapor pressure equal to or less than 0.7 kPa, 5mm Hg, or 0.1 psi measured at 20 degrees C (68 degrees F)
which for all cleaners and solvents combined does not exceed 145 gallons per 12 months;

(4) Any operation using aqueous solutions containing less than 1% by weight of VOCs excluding HAPs;

(5) Paved and unpaved roads and parking lots with public access;

(6) A laboratory as defined in 326 IAC 2-7-1(20)(C);

(7) Seven (7) volatile organic liquid storage tanks, each with maximum storage capacity of 3,000 gallons;

(8) One (1) small spray booth;

(9) Three (3) Vandercocks;

(10) C7 Pan and roll cleaning;

(11) C8 Pan and roll cleaning;

(12) Color Lab Tank;

(13) Wash Tech Cleaning Unit; and

(14) One (1) natural gas fired boiler, constructed in 1986, identified as F, with maximum heat input capacity of 5.25 million British thermal units per hour.

Existing Approvals

The source has been operating under previous approvals including, but not limited to, the following:

(1) Operation Permit OP 2360-0062-0619, issued on August 6, 1990.

(2) Operation Permit OP 2360-0062-0620, issued on August 6, 1990.

(3) Operation Permit OP 2360-0062-0621, issued on August 6, 1990.

(4) Operation Permit OP 2360-0062-0622, issued on August 6, 1990.

(5) Construction Permit CP 089-3522, issued on August 11, 1995.

All conditions from previous approvals were incorporated into this Part 70 permit except the following:

(1) OP 2360-0062-0619, OP 2360-0062-0620, and OP 2630-0062-0621, issued on August 6, 1990:

Condition 6.

> Emissions into the ambient air from the three (3) packaging rotogravure printing presses (C-7, C-8 and C-10) of any material that may be considered toxic by state or federal rules shall be controlled using Reasonable Available Control Technology with the goal of limiting levels of these materials at the property line to one-half of one percent of the 8-hour threshold limit values (TLV's) recommended by the American Conference of Governmental Industrial Hygienists.

Reason not incorporated:

> This condition is no longer applicable to this source.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the Part 70 permit be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 permit application for the purposes of this review was received on December 10, 1996. Additional information was received on February 26, 1998.

A notice of completeness letter was mailed to the source on January 8, 1997

This proposed Part 70 Operating Permit shall satisfy the requirements of 326 IAC 2-1-3.2 (Enhanced New Source Review) for the two (2) Schold mixers.

Emission Calculations

Based on the information in Construction Permit CP 089-3522, issued August 11, 1995, the two (2) existing 30 HP Schold mixers have maximum throughput capacity of 38,340 tons lacquer per year. This is equivalent to 12.62 tons volatile organic compounds (VOC) per year.

Since the source is adding two (2) identical mixers, the potential emissions are the same as the existing two (2) mixers. However, the limited potential to emit (PTE) of volatile organic compounds for the entire lacquer production area, including these two (2) new mixers, is twenty-four (24) tons per year.

Potential Emissions

Pursuant to 326 IAC 1-2-55, Potential Emissions are defined as "emissions of any one (1) pollutant which would be emitted from a facility, if that facility were operated without the use of pollution control equipment unless such control equipment is necessary for the facility to produce its normal product or is integral to the normal operation of the facility."

Pollutant	Potential Emissions (tons/year)
PM	less than 100
PM-10	less than 100
SO_2	less than 100
VOC	greater than 250
CO	less than 100
NO_x	less than 100

Note: For the purpose of determining Title V applicability for particulates, PM-10, not PM, is the regulated pollutant in consideration.

HAP's	Potential Emissions (tons/year)
Methyl Ethyl Ketone	greater than 10
Methyl Isobutyl Ketone	greater than 10
Toluene	greater than 10
Xylene	less than 10
TOTAL	greater than 25

(a) The potential emissions (as defined in 326 IAC 1-2-55) of volatile organic compound (VOC) are equal to or greater than 25 tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential emissions (as defined in 326 IAC 1-2-55) of any single HAP is equal to or greater than ten (10) tons per year and the potential emissions (as defined in 326 IAC 1-2-55) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions
Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive particulate matter (PM) and volatile organic compound (VOC) emissions are not counted toward determination of PSD and Emission Offset applicability.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the Office of Air Management's 1996 emission data.

Pollutant	Actual Emissions (tons/year)
PM	0.000
PM-10	0.000
SO_2	0.000
VOC	5.418
CO	0.000
NO_x	8.260
HAP (specify)	not available

County Attainment Status

The source is located in Lake County.

Pollutant	Status
PM-10	nonattainment
SO_2	nonattainment
NO_2	attainment
Ozone	severe nonattainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) and oxides of nitrogen (NOx) are precursors for the formation of ozone. Therefore, VOC and NO_X emissions are considered when evaluating the rule applicability relating to the ozone standards. Lake County has been designated as nonattainment for ozone.

Federal Rule Applicability

(a) The four (4) packaging rotogravure printing presses are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.430, Subpart QQ), because they are packaging rotogravure printing presses and not publication rotogravure printing presses.

(b) The one (1) hazardous waste storage tank with maximum capacity of 6,000 gallons and the seven (7) volatile organic liquid storage tanks each with maximum storage capacity of 3,000 gallons are not subject to the requirements of the New Source Performance Standard, 326 IAC 12, (40 CFR 60.110b, Subpart Kb), because each of their storage capacities are less than forty (40) cubic meters.

(c) The four (4) packaging rotogravure printing presses are subject to the National Emission Standards for Hazardous Air Pollutants, 326 IAC 14, (40 CFR 60.820, Subpart KK) because they are located at a major source of hazardous air pollutants (HAPs) as defined in 40 CFR 63.2, at which packaging rotogravure printing presses are operated. Pursuant to this subpart:

(1) The Permittee shall comply with these requirements on and after May 30, 1999.

(2) The one (1) flexographic printing press (PS1), shall limit emissions to no more than five percent of the organic HAP applied for the month; or to no more than four percent of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners and other materials applied for the month; or to no more than 20 percent of the mass of solids applied for the month; or to a calculated equivalent allowable mass based on the organic HAP and solids contents of the inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month. The Permittee shall demonstrate compliance with this standard by the following:

(a) Operate a capture system and control device and demonstrate an overall organic HAP efficiency of at least 95 percent for each month as determined by the following:

(1) Determine the oxidizer destruction efficiency (E) using the following procedure:

(i) A performance test of a control device to determine destruction efficiency for the purpose of meeting the requirements of §§ 63.824-63.825 shall be conducted by the Permittee in accordance with the following:

(A) An initial performance test to establish the destruction efficiency of an oxidizer and the associated combustion zone temperature for a thermal oxidizer and the associated catalyst bed inlet temperature for a catalytic oxidizer shall be conducted and the data reduced in accordance with the following reference methods and procedures:

(1) Method 1 of 1A of 40 CFR part 60, appendix A is used for sample and velocity traverses to determine sampling locations.

(2) Method 2, 2A, 2C, or 2D of 40 CFR part 60, appendix A is used to determine gas volumetric flow rate.

(3) Method 3 of 40 CFR part 60, appendix A is used for gas analysis to determine dry molecular weight.

(4) Method 4 of 40 CFR part 60, appendix A is used to determine stack gas moisture.

(5) Methods 2, 2A, 3, and 4 of 40 CFR part 60, appendix A shall be performed, as applicable, at least twice during each test period.

(6) Method 25 of 40 CFR part 60, appendix A, shall be used to determine organic volatile matter concentration, except as provided in the following paragraphs. The Permittee shall submit notice of the intended test method for approval along with notice of the performance test required under § 63.7(c). The Permittee may use Method 25A of 40 CFR part 60, appendix A, if

(I) An exhaust gas organic volatile matter concentration of 50 parts per million by volume (ppmv) or less is required to comply with the standards of §§ 63.827-63.825, or

(II) The organic volatile matter concentration at the inlet to the control system and the required level of control are such to result in exhaust gas organic volatile matter concentrations of 50 ppmv or less, or

(III) Because of the high efficiency of the control device, the anticipated organic volatile matter concentration at the control device exhaust is 50 ppmv or less, regardless of inlet concentration.

(7) Each performance test shall consist of three separate runs; each conducted for at least one hour under the conditions that exist when the affected source is operating under normal operating conditions . For the purpose of determining organic volatile matter concentrations and mass flow rates, the average of results of all runs shall apply,

(8) Organic volatile matter mass flow rates shall be determined using the following equation:

$$M_f = Q_{sd} \left[\sum_{i=1}^{n} C_i M W_i \right] [0.0416] [10^{-6}]$$

(9) Emission control device efficiency shall be determined using the following equation:

$$E = [M_{fi} - M_{fo}] / M_{fi}$$

(B) The Permittee shall record such process information as may be necessary to determine the conditions of the performance test. Operations during periods of start-up, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test.

(C) For the purpose of determining the value of the oxidizer operating parameter that will demonstrate continuing compliance, the time-weighted average of the valued recorded during the performance test shall be computed. For an oxidizer other than catalytic oxidizer, the Permittee shall establish as the operating parameter the minimum combustion temperature. These minimum temperatures are the operating parameter values that demonstrate continuing compliance with the requirements of §§ 63.824-63.825.

(2) Determine the capture system capture efficiency (F) in accordance with the following procedure:

(i) A performance test to determine the capture efficiency of each capture system venting organic emission to a control device for the purpose of meeting the requirements of §§ 63.825(d)(1) shall be conducted by the Permittee in accordance with the following:

(A) For permanent total enclosures, capture efficiency shall be assumed as 100 percent. Procedure T-Criteria for and Verification of a Permanent or Temporary Total Enclosure as found in appendix B to § 52.741 of part 52 of this chapter shall be used to confirm that an enclosure meets the requirements for permanent total enclosure.

(3) Calculate the overall organic HAP control efficiency, (R), achieved using the following equation:

R = EF / 100

(4) Install, calibrate, operate and maintain the instrumentation necessary to measure continuously the site-specific operating parameters established in accordance with § 63.828(a)(4)-(5) whenever a product and packaging rotogravure or wide-web flexographic press is operating.

(3) The affected source is in compliance with the 95 percent overall organic HAP control efficiency requirement for the month if for each press or group of presses controlled by a common control device:

(a) The overall organic HAP control efficiency as determined by the following paragraphs for each press or group of presses served by that control device and a common capture system is equal to or greater than 95 percent, the oxidizer is operated such that the average operating parameter value is greater than the operating parameter value established in accordance with § 63.828(a)(4) for each three hour period, and the average capture system operating parameter value for each capture system serving that control device is greater than or less than (as appropriate) the operating parameter value established for that capture system in accordance with § 63.828(a)(5) for each three hour period.

(1) Pursuant to § 63.828(a)(4) and (a)(5):

(i) A Permittee complying with the requirements of §§ 63.824-63.825 through the use of an oxidizer and demonstrating continuous compliance through monitoring of an oxidizer operating parameter shall:

(A) For an oxidizer, other than a catalytic oxidizer, install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder.

The device shall have an accuracy of ±1 percent of the temperature being monitored in ^{o}C or ±1 ^{o}C, whichever is greater. The thermocouple or temperature sensor shall be installed in the combustion chamber at a location in the combustion zone.

(ii) A Permittee complying with the requirements of §§ 63.824-63.825 through the use of a control device and demonstrating continuous compliance by monitoring an operating parameter to ensure that the capture efficiency measured during the initial compliance test is maintained, shall:

(A) Submit with the compliance status report required by § 63.9(h) of the General Provisions, a plan that

(I) Identifies the operating parameter to be monitored to ensure that the capture efficiency measured during the initial compliance is maintained,

(II) Discusses why this parameter is appropriate for demonstrating ongoing compliance, and

(III) Identifies the specific monitoring procedures;

(B) Set the operating parameter value, or range of values, that demonstrate compliance with §§ 63.824-63.825, and

(C) Conduct monitoring in accordance with the plan submitted unless comments received from U.S. EPA or IDEM, OAM require an alternate monitoring scheme.

(4) The compliance date for a Permittee of an existing affected source subject to the provisions of this subpart is May 30, 1999.

(5) Any excursion from the required operating parameters which are monitored in accordance with § 63.828 (a)(4) and (a)(5), unless otherwise excused, shall be considered a violation of the emission standard.

(6) The recordkeeping provisions of 40 CFR part 63 subpart A of this part that applied and those that do not apply to Permittees of affected sources subject to this subpart are listed in Table 1 of this subpart.

(7) Each Permittee of an affected source subject to this subpart shall maintain the records specified in the following paragraphs on a monthly basis in accordance with the requirements of § 63.10(b)(1) of this part:

(a) Records specified in § 63.10(b)(2) of this part, of all measurements needed to demonstrate compliance with this standard, such as continuous emission monitor data, control device and capture system operating parameter data, material usage, HAP usage, volatile matter usage, and solids usage that support data that the source is required to report.

(b) Records specified in § 63.10(b)(3) of this part for each applicability determination performed by the Permittee in accordance with the requirements of § 63.820(a) of this subpart, and

(c) Records specified in § 63.10(c) of this part for each continuous monitoring system operated by the Permittee in accordance with the requirements of § 63.828(a) of this subpart.

(8) The reporting provisions of 40 CFR part 63 subpart A of this part that apply and those that do not apply to Permittees of affected sources subject to this subpart are listed in Table 1 of this subpart.

(9) Each Permittee of an affected source subject to this subpart shall submit the reports specified in the following paragraphs:

(a) An initial notification required in § 63.9(b).

(1) Initial notifications for existing sources shall be submitted no later than one year before the compliance date specified in § 63.826(a).

(2) Initial notifications for new and reconstructed source shall be submitted as required by § 63.9(b).

(3) For the purpose of this subpart, a Title V or part 70 permit application may be used in lieu of the initial notification required under § 63.9(b), and the State to which the permit application has been submitted has an approved operating permit program under part 70 of this chapter and has received delegation of authority from the EPA.

(4) Permit applications shall be submitted by the same due dates as those specified for the initial notifications.

Since the source submitted the Part 70 Permit Application on December 10, 1996, the requirements of the initial notifcation.

(b) A Notification of Performance Tests specified in § 63.7 and § 63.9(e) if this part. This notification, and the site-specific test plan required under § 63.7(c)(2) shall identify the operating parameter to be monitored to ensure that the capture efficiency measured during the performance test is maintained. The operating parameter identified in the site-specific test plan shall be considered to be approved unless explicitly disapproved, or unless comments received from the Administrator require monitoring of an alternative parameter.

(c) A Notification of Compliance Status specified in § 63.9(h) of this part.

(d) Performance test reports specified in § 63.10(d)(2) of this part.

(e) Start-up, shutdown, and malfunction reports specified in § 63.10(d)(5) of this part, except that the provisions in subpart A pertaining to start-ups, shutdowns, and malfunctions do not apply unless a control device is used to comply with this subpart.

(1) If actions taken by a Permittee during a start-up, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are not completely consistent with the procedure specified in the source's start-up, shutdown, and malfunction plant specified in § 63.6(e)(3) of this part, the Permittee shall state such information on the report. The start-up, shutdown, or malfunction report shall consist of a letter containing the name, title, and signature of the responsible official who is certifying its accuracy, that shall be submitted to the Administrator.

(2) Separate start-up, shutdown, or malfunction reports are not required if the information is included in the report.

(f) A summary report specified in § 63.10(e)(3) of this part shall be submitted on a semi-annual basis (i.e., once every six-month period). In addition to a report of operating parameter exceedances as required by § 63.10(e)(3)(i), the summary report shall include, as applicable:

(1) Exceedances of the standards in §§ 63.824-63.825.

(2) Exceedances of either of the criteria of § 63.820(a)(2).

(3) Exceedances of the criterion of § 63.821(b)(1) and the criterion of § 63.821(b)(2) in the same month.

(4) Exceedances of the criterion of § 63.821(a)(2)(ii)(A).

(10) In delegating implementation and enforcement authority to a State under 40 CFR part 63 subpart E of this part, the authorities contained in paragraph (b) of this section shall be retained by the U.S. EPA and not transferred to IDEM, OAM.

(11) Authority which will not be delegated to IDEM, OAM: § 63.827(b), approval of alternate test method for organic HAP content determination; § 63.827(c), approval of alternate test method for volatile matter determination.

(d) The degreasing operations (Insignificant Activity) are not subject to the requirements of the National Emission Standards for Hazardous Air Pollutants (NESHAPs), 40 CFR 63.460 Subpart T, because they do not use any of the solvents listed in this subpart.

State Rule Applicability - Entire Source

326 IAC 1-6-3 (Preventive Maintenance Plan)

Pursuant to 326 IAC 1-6-3 (Preventive Maintenance Plan), the source is required to maintain a Preventive Maintenance Plan (PMP) for the four (4) packaging rotogravure printing presses.

326 IAC 1-5-2 (Emergency Reduction Plans)

The source has submitted an Emergency Reduction Plan (ERP) on December 10, 1996 with the Part 70 Permit Application. The ERP has been verified to fulfill the requirements of 326 IAC 1-5-2 (Emergency Reduction Plans).

326 IAC 2-3 (Emission Offset)

Pursuant to 326 IAC 2-3 (Emission Offset), this source is a major source. However, this source has not gone through Emission Offset review because it was constructed prior to the applicability date of August 7, 1980 and the subsequent modifications have increased potential volatile organic compound (VOC) emissions less than de minimis levels.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of volatile organic compound (VOC). Pursuant to this rule, the owner/operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8)(Emission Statement Operating Year).

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Visible Emissions Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), visible emissions shall meet the following, unless otherwise stated in this permit:

(a) Visible emissions shall not exceed an average of twenty percent (20%) opacity in twenty-four (24) consecutive readings as determined by 326 IAC 5-1-4,

(b) Visible emissions shall not exceed sixty percent (60%) opacity for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) in a six (6) hour period.

326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements)

The Permittee shall be in violation of 326 IAC 6-1-11.1 (Lake County Fugitive Particulate Matter Control Requirements), if the opacity of fugitive particulate emissions exceeds ten percent (10%). Compliance with this limitation shall be determined by 40 CFR 60, Appendix A, Method 9.

State Rule Applicability - Individual Facilities

326 IAC 8-5-5 (Graphic Arts Operations)

The four (4) packaging rotogravure printing presses (C-7, C-8, C-10 and Texmac) are subject to the requirements of 326 IAC 8-5-5 (Graphic Arts Operations) and 326 IAC 8-1-9 through 326 IAC 8-1-12, because they are located at a source in Lake County that as of October 1, 1993 has potential volatile organic compound (VOC) emissions greater than twenty-five (25) tons per year.

Pursuant to 326 IAC 8-5-5 (Graphic Arts Operations), the Permittee shall operate an incineration system that oxidizes at least ninety percent (90%) of the nonmethane volatile organic compounds (volatile organic compounds measured as total combustible carbon) to carbon dioxide and water. Also, the Permittee shall attain an efficiency sufficient to achieve an overall control efficiency, in conjunction with the emission control system of sixty-five percent (65%). A compliance stack test shall be performed to document compliance with this requirement. Compliance with 40 CFR 63.820, Subpart KK shall satisfy the requirements of 326 IAC 8-5-5 (Graphic Arts Operations).

326 IAC 8-1-9 (General Record Keeping Requirements)

Compliance with 40 CFR 63.820, Subpart KK shall satisfy the requirements of 326 IAC 8-1-9 (General Record Keeping Requirements). Pursuant to 326 IAC 8-1-9 (General Record Keeping Requirements), the Permittee shall comply with all record keeping and reporting requirements.

All records required by this rule or records necessary to determine compliance with 326 IAC 8-5-5 shall be accessible on-site for the most recent three (3) year period and shall be reasonably accessible for an additional two (2) year period.

326 IAC 8-1-12 (Compliance Certification, Record Keeping, and Reporting Requirements for Certain Coating Facilities Using Control Devices)

Compliance with 40 CFR 63.820, Subpart KK shall satisfy the requirements of 326 IAC 8-1-12 (Compliance Certification, Record Keeping, and Reporting Requirements for Certain Coating Facilities Using Control Devices). Pursuant to 326 IAC 8-1-12 (Compliance Certification, Record Keeping, and Reporting Requirements for Certain Coating Facilities Using Control Devices), the Permittee shall comply with the following requirements:

(a) Control system operation, maintenance, and testing requirements shall be as follows:

(1) The control system shall be operated and maintained according to the manufacturer's recommendations but may be modified based on the results of the initial or subsequent compliance test or upon the written request of the department.

(2) A copy of the operating and maintenance procedures shall be maintained in a convenient location at the source property and as close to the control system as possible for reference by plant personnel and department inspectors.

(3) The control system shall be tested according to the following schedule and in the following situations:

(A) An initial compliance test shall be conducted. Compliance tests shall be conducted no later than every thirty (30) months after the date of the initial test.

(B) A compliance test shall be conducted whenever the Permittee chooses to operate a control system under conditions different from those that were in place at the time of the previous test.

(C) A compliance test shall be performed within ninety (90) days of:

(i) Startup of a new coating facility;

(ii) Changing the method of compliance for an existing coating facility from compliance coatings or daily-weighted averaging to control devices; or

(iii) Receipt of a written request from the department or U.S. EPA.

(4) All compliance tests shall be conducted according to a protocol approved by the department at least thirty (30) days before the test. The protocol shall contain, at a minimum, the following information:

(A) Test procedures.

(B) Operating and control system parameters.

(C) Type of VOC containing process material being used.

(D) The process and control system parameters that will be monitored during the test.

(b) Monitoring equipment requirements shall be as follows:

(1) If a thermal incinerator is used for VOC reduction, a temperature monitoring device capable of continuously recording the temperature of the gas stream in the combustion zone of the incinerator shall be sued. The temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees Centigrade, or plus or minus five-tenths degree Centigrade, whichever is more accurate.

(c) On and after startup of a new coating facility, or upon changing the method of compliance for an existing coating facility from the use of compliance coatings or daily-weighted averaging to control devices, the Permittee shall collect and record each day for each coating facility:

(1) The name and identification of each coating used at each coating facility.

(2) The mass of VOC per unit volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating expressed in units necessary to determine compliance, used each day at each coating facility.

(3) The maximum VOC content (mass of VOC per unit volume of coating solids, as applied) or the daily weighted average VOC content (mass of VOC per unit volume of coating solids, as applied) of the coatings used each day on each coating facility.

(4) The required overall emission reduction efficiency for each day for each coating facility.

(5) The actual overall emission reduction efficiency achieved for each day for each coating facility as determined during the compliance test required by subsection (a)(3).

(6) Control device monitoring data as follows:

(A) For thermal incinerators, the following:

(i) Continuous records of the temperature in the gas stream in the combustion zone of the incinerator.

(ii) Records of all three (3) hour periods of operation in which the average combustion temperature of the gas stream in the combustion zone was more than fifty degrees Fahrenheit (twenty-eight degrees Centigrade) below the average combustion temperature that existed during the most recent test that demonstrated that the coating facility was in compliance.

(7) A log of operating time for the capture system, control device, monitoring equipment, and the associated coating facility.

(8) A maintenance log for the capture system, control device, and monitoring equipment detailing all routine and nonroutine maintenance performed including dates and duration of any outages.

(d) The Permittee shall notify the department in either of the following instances:

(1) Any record showing noncompliance with the applicable requirements for control devices shall be reported by submitting a copy of the record to the department within thirty (30) days following noncompliance; such record shall also be submitted with the quarterly compliance report. The following information shall accompany each submittal:

(A) Name and location of the coating facility.

(B) Identification of the control system where the noncompliance occurred and the coating facility it served.

(C) Time, date and duration of the noncompliance.

(D) Corrective action taken.

(2) At least thirty (30) calendar days before changing the method of compliance from control devices to the use of compliant coatings or daily-weighted averaging, the Permittee shall comply with all applicable requirements of section 10(b) or 11(b) of this rule, respectively. Upon changing the method of compliance from control devices to the use of compliant coatings or daily-weighted averaging, the Permittee shall comply with all requirements of section 10 or 11 of this rule, respectively, applicable to the coating facility subject to 326 IAC 8-5-5.

326 IAC 8-1-5 (Petition for Site-Specific Reasonably Available Control Technology (RACT) Plan) and
326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties)

Compliance with 40 CFR 63.820, Subpart KK shall satisfy the requirements of 326 IAC 8-1-5 (Petition for Site-Specific Reasonably Available Control Technology (RACT) Plan) and 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties).

(a) Pursuant to OP 2360-0062-0619, OP 2360-0062-0620 and OP 2360-0062-0621, issued on August 6, 1990 and 326 IAC 8-1-5 (Petition for Site-Specific Reasonably Available Control Technology (RACT) Plan) and 326 IAC 8-7 (Specific VOC Reduction Requirements for Lake, Porter, Clark and Floyd Counties):

(1) Emissions into the ambient air from the four (4) packaging rotogravure printing presses (C-7, C-8, C-10 and Texmac) of any material that may be considered toxic by applicable state or federal rules shall be controlled using Reasonable Available Control Technology with the goal of limiting levels of these materials at the property line to one-half of one percent of the 8-hour threshold limit values (TLV's) recommended by the American Conference of Governmental Industrial Hygienists.

326 IAC 8-1-6 (General Reduction Requirements)

Pursuant to CP 089-3522-00062, issued August 11, 1995:

(a) The pigment produced by the pigment stripper shall be limited to 96.5 tons per 12 month period, rolled on a monthly basis. This is equivalent to volatile organic compound (VOC) potential to emit (PTE) of twenty-four (24) tons per 12 month period. Therefore, the facility will not be subject to the requirements of 326 IAC 8-1-6 (General Reduction Requirements).

(b) The amount of lacquer ingredients mixed in the lacquer production mixers shall be limited to 75,000 tons per 12 month period, rolled on a monthly basis. This is equivalent to volatile organic compound (VOC) potential to emit (PTE) of twenty-four (24) tons per 12 month period. This limitation includes the two (2) new Schold mixers. Therefore, the facility will not be subject to the requirements of 326 IAC 8-1-6 (General Reduction Requirements).

326 IAC 8-9 (Volatile Organic Liquid Storage Vessels)

The one (1) hazardous waste above ground storage tank and the seven (7) volatile organic liquid storage tanks are only subject to the record keeping requirements of 326 IAC 8-9-6(a) and (b) because each of their storage capacities are less than 39,000 gallons. Pursuant to 326 IAC 8-9-6(a) and (b), the Permittee shall keep the following records for life of the vessel:

(a) The vessel identification number.

(b) The vessel dimensions.

(c) The vessel capacity.

326 IAC 8-3-2 (Cold Cleaner Operations)

The insignificant degreasing operations shall be in compliance with these requirements by complying with 326 IAC 8-3-5 (Cold Cleaner Degreaser Operation and Control).

326 IAC 8-3-5 (Cold Cleaner Operation and Control)

(a) Pursuant to 326 IAC 8-3-5(a) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaner degreaser facility shall ensure that the following control equipment requirements are met:

(1) Equip the degreaser with a cover. The cover must be designed so that it can be easily operated with one (1) hand if:

(A) The solvent volatility is greater than two (2) kiloPascals (fifteen (15) millimeters of mercury or three-tenths (0.3) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$));

(B) The solvent is agitated; or

(C) The solvent is heated.

(2) Equip the degreaser with a facility for draining cleaned articles. If the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius ($38^{O}C$) (one hundred degrees Fahrenheit ($100^{O}F$)), then the drainage facility must be internal such that articles are enclosed under the cover while draining. The drainage facility may be external for applications where an internal type cannot fit into the cleaning system.

(3) Provide a permanent, conspicuous label which lists the operating requirements outlined in subsection (b).

(4) The solvent spray, if used, must be a solid, fluid stream and shall be applied at a pressure which does not cause excessive splashing.

(5) Equip the degreaser with one (1) of the following control devices if the solvent volatility is greater than four and three-tenths (4.3) kiloPascals (thirty-two (32) millimeters of mercury or six-tenths (0.6) pounds per square inch) measured at thirty-eight degrees Celsius (38^{O}C) (one hundred degrees Fahrenheit (100^{O}F)), or if the solvent is heated to a temperature greater than forty-eight and nine-tenths degrees Celsius (48.9^{O}C) (one hundred twenty degrees Fahrenheit (120^{O}F)):

(A) A freeboard that attains a freeboard ratio of seventy-five hundredths (0.75) or greater.

(B) A water cover when solvent is used is insoluble in, and heavier than, water.

(C) Other systems of demonstrated equivalent control such as a refrigerated chiller of carbon adsorption. Such systems shall be submitted to the U.S. EPA as a SIP revision.

(b) Pursuant to 326 IAC 8-3-5(b) (Cold Cleaner Degreaser Operation and Control), the owner or operator of a cold cleaning facility shall ensure that the following operating requirements are met:

(1) Close the cover whenever articles are not being handled in the degreaser.

(2) Drain cleaned articles for at least fifteen (15) seconds or until dripping ceases.

(3) Store waste solvent only in covered containers and prohibit the disposal or transfer of waste solvent in any manner in which greater than twenty percent (20%) of the waste solvent by weight could evaporate.

326 IAC 6-2-4 (Emission Limitations for Facilities Specified in 326 IAC 6-2-1(d))

Pursuant to 326 IAC 6-2-4 (Particulate Emission Limitations for Sources of Indirect Heating), the particulate matter emissions from the 5.25 million British thermal unit per hour natural gas fired boiler constructed in 1986, shall be limited to 0.6 pounds per million British thermal unit heat input. This limit is calculated by the following equation:

$$Pt = 1.09 / Q^{0.26}$$

where:

Pt = Pounds of particulate matter emitted per million Btu (lb/mmBtu) heat input.

Q = Total source maximum operating capacity rating in million Btu per hour (mmBtu/hr) heat input. The maximum operating capacity rating is defined as the maximum capacity at which the facility is operated or the nameplate capacity, whichever is specified in the facility's permit application, except when some lower capacity is contained in the facility's operation permit; in which case, the capacity specified in the operation permit shall be used.

For Q less than 10 mmBtu/hr, Pt shall not exceed 0.6 lb/mmBtu.

For the boiler, Q = 5.25

$$Pt = 1.09 / 5.25^{0.26} = 0.71 \text{ lb/mmBtu}$$

Since 0.71 lb/mmBtu > 0.6 lb/mmBtu, the boiler shall be limited to 0.6 lb/mmBtu.

The boiler is in compliance when using natural gas by the following equation:

12.0 lb/MMCF, to convert this to lb/mmBtu = 12.0 lb/MMCF * MMCF/ 1,000 mmBtu = 0.0120 lb/mmBtu

0.0120 lb/mmBtu < 0.6 lb/mmBtu, therefore the boiler is in compliance.

326 IAC 6-1 (Nonattainment Area Limitations)

The two (2) new Schold mixers are not subject to the requirements of 326 IAC 6-1 (Nonattainment Area Limitations) because the potential particulate matter (PM) emissions from the entire source are less than one hundred (100) tons per year.

Compliance Requirements

Permits issued under 326 IAC 2-7 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAM, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-7-5. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

1. The four (4) packaging rotogravure printing presses have applicable compliance monitoring conditions as specified below:

   (a) The C-7 and C-8 thermal oxidizers shall operate at all times that the four (4) packaging rotogravure printing presses are operated. When operating, the thermal incinerator shall maintain a minimum operating temperature of 1,400 ^{o}F or a temperature, fan amperage, or duct velocity determined in the compliance tests to maintain a minimum 83% overall destruction of the volatile organic compounds (VOC) generated.

   (b) A temperature monitoring device capable of continuously recording the temperature of the gas stream in the combustion zone of the incinerator shall be used. The temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees Centigrade, or plus or minus five-tenths degree Centigrade, whichever is more accurate.

These monitoring conditions are necessary because the thermal oxidizers for the packaging rotogravure printing presses must operate properly to ensure compliance with 40 CFR 63.820, Subpart KK, 326 IAC 8-5-5 (Graphic Arts Operations) and 326 IAC 2-7 (Part 70).

Air Toxic Emissions

Indiana presently requests applicants to provide information on emissions of the 187 hazardous air pollutants (HAPs) set out in the Clean Air Act Amendments of 1990. These pollutants are either carcinogenic or otherwise considered toxic and are commonly used by industries. They are listed as air toxics on the Office of Air Management (OAM) Part 70 Application Form GSD-08.

(a) This source will emit levels of air toxics greater than those that constitute major source applicability according to Section 112 of the 1990 Clean Air Act Amendments.

(b) 326 IAC 2-1-3.4 (New Source Toxics Rule) does not apply to this source because the new emission units are a modification to an existing facility.

Conclusion

The operation of this commercial gravure printing and pigment and lacquer manufacturing operation shall be subject to the conditions of the attached proposed **Part 70 Permit No. T089-7441-00062.**

Indiana Department of Environmental Management
Office of Air Management

Addendum to the
Technical Support Document for Part 70 Operating Permit
and Enhanced New Source Review (ENSR)

Source Name:	Avery Dennison MFD
Source Location:	650 West 67th Avenue, Schererville, Indiana 46375-1390
County:	Lake
SIC Code:	2754, 2816, 2851
Operation Permit No.:	T089-7441-00062
Permit Reviewer:	Catherine Moore

On October 2, 1998, the Office of Air Management (OAM) had a notice published in the Gary Post Tribune, Gary, Indiana, and the Times, Munster, Indiana stating that Avery Dennison MFD had applied for a Part 70 Operating Permit to operate a commercial gravure printing and pigment and lacquer manufacturing operation. The notice also stated that OAM proposed to issue a permit for this operation and provided information on how the public could review the proposed permit and other documentation. Finally, the notice informed interested parties that there was a period of thirty (30) days to provide comments on whether or not this permit should be issued as proposed.

On October 14, 1998, Carl Muehlman of Avery Dennison MFD submitted comments on the proposed Part 70 Operating Permit. The summary of the comments is as follows:

Comment 1:

In IDEM's pre-public notice comments, IDEM claims that the following rules give the state authority to require a Compliance Monitoring Plan and Compliance Response Plan. Please state where in the cited rules this requirement is located.

326 IAC 2-7-5: Part 70 permit contents:

326 IAC 2-7-5(1)(A) - Please list the origin of and authority for a Compliance Monitoring Plan and Compliance Response Plan.

326 IAC 2-7-5(1)(H) - Response actions to emergency situations is stated but does not talk about a "plan".

326 IAC 2-7-5(3) - Discusses monitoring and related record keeping. This rule does not talk about a Compliance Response Plan.

326 IAC 2-7-5(13) - Permit must describe the preventive maintenance program. This rule does not talk about a Compliance Response Plan.

326 IAC 2-7-6(1) - States you must have compliance certification, testing, monitoring, reporting and record keeping sufficient to assure compliance. This rule does not talk about a Compliance Response Plan.

326 IAC 2-7-6 - Part 70 Permit Compliance: Compliance certification does not state anything about a monitoring plan.

326 IAC 1-6-3 - States you must have a preventive maintenance plan for emission control devices. This rule does not talk about a Compliance Response Plan.

326 IAC 1-6-5 - This discusses excessive malfunctions not a Compliance Response Plan.

Determining compliance for our facility is rather simple: If the Thermal Oxidizer fire box temperature fluctuates from its set point, the press will shut down. Records are kept for all operational parameters. This is done automatically by a PLC controller. If this fails, the operator will see a flashing light and will shut down the press manually. The 100% capture system air flow is driving by the fume fan. If the fume fan fails or slows down, the LEL monitors will automatically shut down the press to prevent an explosion. It is Avery Dennison's policy to not have any permit violations. If our Thermal Oxidizer needed a part and we did not have it, we would not run the press under any circumstances until the unit was repaired.

There is no reference or inference to regulations that require C.16(a) through (d). Also, C.16(a)(2) through (4) are already required by this permit in Section D. The regulations already spell out what response steps are necessary.

How can the source write a CRP that is enforceable when the whole section of C.16 is not based upon any regulation ? If the source does not write it correctly the CRP could lead to a violation without violating a rule requirement.

Response to Comment 1:

IDEM has worked with members of the Clean Air Act Advisory Council's Permit Committee, Indiana Manufacturing Association, Indiana Chamber of Commerce and individual applicants regarding the Preventive Maintenance Plan, the Compliance Monitoring Plan and the Compliance Response Plan. IDEM has clarified the preventive maintenance requirements by working with sources on draft language over the past two years. The plans are fully supported by rules promulgated by the Air Pollution Control Board. The plans are the mechanism each permittee will use to verify continuous compliance with its permit and the applicable rules and will form the basis for each permittee's Annual Compliance Certification. Each permittee's ability to verify continuous compliance with its air pollution control requirements is a central goal of the Part 70 permit program.

The regulatory authority for and the essential elements of a compliance monitoring plan were clarified in IDEM's Compliance Monitoring Guidance, in May 1996. IDEM originally placed all the preventive maintenance requirements in the permit section titled "Preventive Maintenance Plan." Under that section the permittee's Preventive Maintenance Plan (PMP) had to set out requirements for the inspection and maintenance of equipment both on a routine basis and in response to monitoring. Routine maintenance was a set schedule of inspections and maintenance of the equipment. The second was inspection and maintenance in response to monitoring that showed that the equipment was not operating in its normal range. This monitoring would indicate that maintenance was required to prevent the exceedance of an emission limit or other permit requirement. The maintenance plan was to set out the "corrective actions" that the permittee would take in the event an inspection indicated an "out of specification situation", and also set out the time frame for taking the corrective action. In addition, the PMP had to include a schedule for devising additional corrective actions for out of compliance situations that the source had not predicted in the PMP. All these plans, actions and schedules were part of the Preventive Maintenance Plan, with the purpose of maintaining the permittee's equipment so that an exceedance of an emission limit or violation of other permit requirements could be prevented.

After issuing the first draft Title V permits on public notice in July of 1997, IDEM received comments from members of the regulated community regarding many of the draft permit terms, including the PMP requirements. One suggestion was that the corrective action and related schedule requirements be removed from the PMP requirement and placed into some other requirement in the permit. This suggestion was based, in some part, on the desire that a permittee's maintenance staff handle the

routine maintenance of the equipment, and a permittee's environmental compliance and engineering staff handle the compliance monitoring and steps taken in reaction to an indication that the facility required maintenance to prevent an environmental problem.

IDEM carefully considered this suggestion and agreed to separate the "corrective actions" and related schedule requirements from the PMP. These requirements were placed into a separate requirement, which IDEM named the Compliance Response Plan (CRP). In response to another comment, IDEM changed the name of the "corrective actions" to "response steps." That is how the present CRP requirements because separated from the PMP requirement, and acquired their distinctive nomenclature.

Other comment sought clarification on whether the failure to follow the PMP was violation of the permit. The concern was that a permittee's PMP might call for the permittee to have, for example, three "widget" replacement parts in inventory. If one widget was taken from inventory for use in maintenance, then the permittee might be in violation of the PMP, since there were no longer three widgets in inventory, as required by the PMP. Comments also expressed a view that if a maintenance employee was unexpectedly delayed in making the inspection under the PMP's schedule, for example by the employee's sudden illness, another permit violation could occur, even though the equipment was still functioning properly.

IDEM considered the comments and revised the PMP requirement so that if the permittee fails to follow its PMP, a permit violation will occur only of the lack of proper maintenance causes or contributes to a violation of any limitation on emissions or potential to emit. This was also the second basis for separating the compliance maintenance response steps from the PMP and placing them in the Compliance Response Plan (CRP). Unlike the PMP, the permittee must conduct the required monitoring and take any response steps as set out in the CRP (unless otherwise excused) or a permit violation will occur.

The Compliance Monitoring Plan is made up of the PMP, the CRP, the compliance monitoring and compliance determination requirements in section D of the permit, and the record keeping and reporting requirements in sections C and D. IDEM decided to list all these requirements under this new name, the Compliance Monitoring Plan (CMP), to distinguish them from the PMP requirements. The section D provisions set out which facilities must comply with the CMP requirement. The authority for the CMP provisions is found at 326 IAC 2-7-5(1), 2-7-5(3), 2-7-5(13), 2-7-6(1), 1-6-3 and 1-6-5.

Most permittees already have a plan for conducting preventive maintenance for the emission units and control devices. It is simply a good business practice to have identified the specific personnel whose job duties include inspecting, maintaining and repairing the emission control devices. The emission unit equipment and the emission control equipment may be covered by a written recommendation from the manufacturer set out schedules for the regular inspection and maintenance of the equipment. The permittee will usually have adopted an inspection and maintenance schedule that works for its particular equipment and process in order to keep equipment downtime to a minimum and achieve environmental compliance. The manufacturer may also have indicate, or the permittee may know from experience, what replacement parts should be kept on hand. The permittee may already keep sufficient spare parts on hand so that if a replacement is needed, it can be quickly installed, without a delay in the permittee's business activities and without an environmental violation. For the most part, the PMP can be created by combining present business practices and equipment manufacturer guidance into one document, the Preventive Maintenance Plan (PMP).

The permittee has 90 days to prepare, maintain and implement the PMP. IDEM is not going to draft the PMP. Permittees know their processes and equipment extremely will and are in the best position to draft the PMP. IDEM's air inspectors and permit staff will be available to assist the permittee with any questions about the PMP. IDEM may request a copy of the PMP to review and approve.

The Preventive Maintenance Plan requirement must be included in every applicable Part 70 permit pursuant to 326 IAC 2-7-5(13). This rule refers back to the Preventive Maintenance Plan requirement as described in 326 IAC 1-6-3. This Preventive Maintenance Plan rule sets out the requirements for:

(1) Identification of the individuals responsible for inspecting, maintaining and repairing the emission control equipment (326 IAC 1-6-3-(a)(1)),
(2) The description of the items or conditions in the facility that will be inspected and the inspection schedule for said items or conditions (326 IAC 1-6-3(a)(2)), and
(3) The identification and quantification of the replacement parts for the facility which the permittee will maintain in inventory for quick replacement (326 IAC 1-6-3(a)(2)).

It is clear from the structure of the wording in 326 IAC 1-6-3 that the PMP requirement affects the entirety of the applicable facilities. Only 326 IAC 1-6-3(a)(1) is limited, in that it requires identification of the personnel in charge of only the emission control equipment, not any other facility equipment. The commissioner may require changes in the maintenance plan to reduce excessive malfunctions in any control device or combustion or process equipment under 326 IAC 1-6-5.

The CRP requirement of response steps and schedule requirements are another example of documenting procedures most permittees already have developed in the course of good business practices and the prevention of environmental problems. Equipment will often arrive with the manufacturer's trouble shooting guide. It will specify the steps to take when the equipment is not functioning correctly. The steps may involve some initial checking of the system to locate the exact cause, and other steps to place the system back into proper working order. Using the trouble shooting guide and the permittee's own experience with the equipment, the steps are taken in order and as scheduled until the problem is fixed.

A permittee will likely already have a procedure to follow when an unforeseen problem situation occurs. The procedure may list the staff to contact in order to select a course of action, or other step, before the equipment problem creates an environmental violation or interrupts the permittee's business process.

The Compliance Monitoring Plan (CMP) is consistent with IDEM's Compliance Monitoring Guidance released in May of 1996. The guidance discusses corrective action plans setting out the steps to take when compliance monitoring shows an out of range reading. Some of the terminology has changed, as a result of the comments from regulated sources, but the requirements in the permit do not conflict with the guidance.

Pursuant to 326 IAC 2-7-6(6), the Part 70 Permit shall contain such other provisions as the commissioner may require to ensure compliance with the Part 70 Permit.

In this case the Compliance Monitoring Plan consists of the permit conditions establishing a minimal set point temperature [40 CFR 63.827], the various monitoring, record keeping, and reporting conditions, and a response plan that reflects the statement offered by the applicant. The compliance monitoring plan for 40 CFR 63 Subpart KK is similarly establish by condition [40 CFR 63.828] et al.

Upon further review, OAM has made the following changes to the final Part 70 permit.

1. The name in the signature block on the cover page has been changed from "Felicia R. George" to "**Janet G. McCabe**".

2. The conditions in Section D.1 "FACILITY OPERATION CONDITIONS" have been deleted and replaced with the following conditions:

~~D.1.1 Volatile Organic Compounds (VOC) [326 IAC 20-18] [40 CFR 63.820, Subpart KK] [326 IAC 8-5-5]~~

Compliance with 40 CFR 63.820, Subpart KK shall satisfy the requirements of 326 IAC 8-5-5. Pursuant to 40 CFR 63.820, Subpart KK:

(a) The Permittee shall comply with these requirements beginning on May 30, 1999.

(b) The four (4) rotogravure printing presses (C-7, C-10, C-8 and Texmac), shall limit emissions:

(1) To no more than five percent of the organic HAP applied for the month; or
(2) To no more than four percent of the mass of inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners and other materials applied for the month; or

(3) To no more than 20 percent of the mass of solids applied for the month; or

(4) To a calculated equivalent allowable mass based on the organic HAP and solids contents of the inks, coatings, varnishes, adhesives, primers, solvents, reducers, thinners, and other materials applied for the month.

(c) The Permittee shall demonstrate compliance with this standard by the following:

(1) Operate a capture system and control device and demonstrate an overall organic HAP efficiency of at least 95 percent for each month as determined in Condition D.1.3.

(d) In delegating implementation and enforcement authority to a State under 40 CFR part 63 subpart E of this part, the authorities contained in paragraph (e) of this section shall be retained by the U.S. EPA, Air and Radiation Division, Air Enforcement Branch and not transferred to IDEM, OAM.

(e) Authority which will not be delegated to IDEM, OAM: § 63.827(b), approval of alternate test method for organic HAP content determination; § 63.827(c), approval of alternate test method for volatile matter determination.

D.1.2 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.1.3 Testing Requirements [326 IAC 20-18] [40 CFR 63.820, Subpart KK] [326 IAC 8-1-12]

(a) A Permittee complying with the requirements of §§ 63.824-63.825 through the use of a control device and demonstrating continuous compliance by monitoring an operating parameter to ensure that the capture efficiency measured during the initial compliance test is maintained, shall:

(1) Set the operating parameter value, or range of values, that demonstrate compliance with §§ 63.824-63.825, and

(2) Conduct monitoring in accordance with the plan submitted to the addresses listed in Condition D.1.7 unless comments received require an alternate monitoring scheme.

(b) Any excursion from the required operating parameters which are monitored in accordance with § 63.828 (a)(4) and (a)(5), unless otherwise excused, shall be considered a violation of the emission standard.

~~(c) To document compliance with Condition D.1.1, the Permittee shall conduct a performance test in accordance with the following:~~

~~(1) Determine the oxidizer destruction efficiency (E) using the following procedure:~~

~~(A) A performance test of a control device to determine destruction efficiency for the purpose of meeting the requirements of §§ 63.824-63.825 shall be conducted by the Permittee in accordance with the following:~~

~~(i) An initial performance test to establish the destruction efficiency of an oxidizer and the associated combustion zone temperature for a thermal oxidizer and the associated catalyst bed inlet temperature for a catalytic oxidizer shall be conducted and the data reduced in accordance with the following reference methods and procedures:~~

~~(1) Method 1 of 1A of 40 CFR part 60, appendix A is used for sample and velocity traverses to determine sampling locations.~~

~~(2) Method 2, 2A, 2C, or 2D of 40 CFR part 60, appendix A is used to determine gas volumetric flow rate.~~

~~(3) Method 3 of 40 CFR part 60, appendix A is used for gas analysis to determine dry molecular weight.~~

~~(4) Method 4 of 40 CFR part 60, appendix A is used to determine stack gas moisture.~~

~~(5) Methods 2, 2A, 3, and 4 of 40 CFR part 60, appendix A shall be performed, as applicable, at least twice during each test period.~~

~~(6) Method 25 of 40 CFR part 60, appendix A, shall be used to determine organic volatile matter concentration, except as provided in the following paragraphs. The Permittee shall submit notice of the intended test method to the Administrator for approval along with notice of the performance test required under § 63.7(c). The Permittee may use Method 25A of 40 CFR part 60, appendix A, if~~

~~(I) An exhaust gas organic volatile matter concentration of 50 parts per million by volume (ppmv) or less is required to comply with the standards of §§ 63.827-63.825, or~~

~~(II) The organic volatile matter concentration at the inlet to the control system and the required level of control are such to result in exhaust gas organic volatile matter concentrations of 50 ppmv or less, or~~

~~(III) Because of the high efficiency of the control device, the anticipated organic volatile matter concentration at the control device exhaust is 50 ppmv or less, regardless of inlet concentration.~~

~~(7) Each performance test shall consist of three separate runs; each conducted for at least one hour under the conditions that exist when the affected source is operating under normal operating conditions . For the purpose of determining organic volatile matter concentrations and mass flow rates, the average of results of all runs shall apply;~~

~~(8) Organic volatile matter mass flow rates shall be determined using the following equation:~~

$$M_f = Q_{sd} [\ 3\ C_i\ M\ W_i\ ] [0.0416] [10^{-6}]$$ (i = 1 to n)

~~(9) Emission control device efficiency shall be determined using the following equation:~~

$$E = [\ M_{fi} - M_{fo}\ ] / M_{fi}$$

~~(ii) The Permittee shall record such process information as may be necessary to determine the conditions of the performance test. Operations during periods of start-up, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test.~~

~~(iii) For the purpose of determining the value of the oxidizer operating parameter that will demonstrate continuing compliance, the time-weighted average of the valued recorded during the performance test shall be computed. For an oxidizer other than catalytic oxidizer, the Permittee shall establish as the operating parameter the minimum combustion temperature. These minimum temperatures are the operating parameter values that demonstrate continuing compliance with the requirements of §§ 63.824-63.825.~~

~~(2) Determine the capture system capture efficiency (F) in accordance with the following procedure:~~

~~(A) A performance test to determine the capture efficiency of each capture system venting organic emission to a control device for the purpose of meeting the requirements of §§ 63.825(d)(1) shall be conducted by the Permittee in accordance with the following:~~

~~(i) For permanent total enclosures, capture efficiency shall be assumed as 100 percent. Procedure T-Criteria for and Verification of a Permanent or Temporary Total Enclosure as found in appendix B to § 52.741 of part 52 of this chapter shall be used to confirm that an enclosure meets the requirements for permanent total enclosure.~~

~~(3) Calculate the overall organic HAP control efficiency, (R), achieved using the following equation:~~

~~R = EF / 100~~

~~(4) Install, calibrate, operate and maintain the instrumentation necessary to measure continuously the site-specific operating parameters established in accordance with § 63.828(a)(4)-(5) whenever a product and packaging rotogravure or wide-~~

~~web flexographic press is operating.~~

~~(b) The affected source is in compliance with the 95 percent overall organic HAP control efficiency requirement for the month if for each press or group of presses controlled by a common control device:~~

~~(1) The overall organic HAP control efficiency as determined by the following paragraphs for each press or group of presses served by that control device and a common capture system is equal to or greater than 95 percent, the oxidizer is operated such that the average operating parameter value is greater than the operating parameter value established in accordance with § 63.828(a)(4) for each three hour period, and the average capture system operating parameter value for each capture system serving that control device is greater than or less than (as appropriate) the operating parameter value established for that capture system in accordance with § 63.828(a)(5) for each three hour period.~~

~~(A) Pursuant to § 63.828(a)(4) and (a)(5):~~

~~(i) A Permittee complying with the requirements of §§ 63.824-63.825 through the use of an oxidizer and demonstrating continuous compliance through monitoring of an oxidizer operating parameter shall:~~

~~(1) For an oxidizer, other than a catalytic oxidizer, install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device shall have an accuracy of ±1 percent of the temperature being monitored in °C or ±1 °C, whichever is greater. The thermocouple or temperature sensor shall be installed in the combustion chamber at a location in the combustion zone.~~

~~Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]~~

~~D.1.4 Volatile Organic Compounds (VOC) [326 IAC 8-5-5]~~

~~Pursuant to 326 IAC 8-5-5 (Graphic Arts Operations), the Permittee shall operate an incineration system that oxidizes at least ninety percent (90%) of the nonmethane volatile organic compounds (volatile organic compounds measured as total combustible carbon) to carbon dioxide and water. Also, the Permittee shall attain an efficiency sufficient to achieve an overall control efficiency, in conjunction with the emission control system of sixty-five percent (65%). Compliance with Condition D.1.3 shall satisfy the requirements of this Condition.~~

~~Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]~~

~~D.1.5 Volatile Organic Compounds (VOC) [326 IAC 20-18] [40 CFR 63.820, Subpart KK] [326 IAC 8-1-12]~~

~~(a) The recordkeeping provisions of 40 CFR part 63 subpart A of this part that applied and those that do not apply to Permittees of affected sources subject to this subpart are listed in Table 1 of this subpart.~~

~~(b) Each Permittee of an affected source subject to this subpart shall maintain the records specified in the following paragraphs on a monthly basis in accordance with the requirements of § 63.10(b)(1) of this part:~~

(1) Records specified in § 63.10(b)(2) of this part, of all measurements needed to demonstrate compliance with this standard, such as continuous emission monitor data, control device and capture system operating parameter data, material usage, HAP usage, volatile matter usage, and solids usage that support data that the source is required to report.

(2) Records specified in § 63.10(b)(3) of this part for each applicability determination performed by the Permittee in accordance with the requirements of § 63.820(a) of this subpart, and

(3) Records specified in § 63.10(c) of this part for each continuous monitoring system operated by the Permittee in accordance with the requirements of § 63.828(a) of this subpart.

D.1.6 Record Keeping Requirements

(a) To document compliance with Conditions D.1.1 and D.1.4, the Permittee shall maintain records in accordance with (1) through (6) below. Records maintained for (1) through (6) shall be taken daily and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Conditions D.1.1, and D.1.4.

(1) The amount (in pounds) and VOC content (in pounds) of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;

(2) A log of the dates of use;

(3) The cleanup solvent usage (in pounds) for each day;

(5) The total VOC usage (in pounds) for each day; and

(6) The weight of VOCs emitted for each compliance period.

(b) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.7 Reporting Requirements [326 IAC 20-18] [40 CFR 63.830, Subpart KK]

(a) A summary of the information to document compliance with Conditions D.1.1, D.1.3, and D.1.5 shall be submitted to the following addresses:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

~~(b) A Permittee complying with the requirements of §§ 63.824-63.825 through the use of a control device and demonstrating continuous compliance by monitoring an operating parameter to ensure that the capture efficiency measured during the initial compliance test is maintained, shall:~~

~~(1) Submit with the compliance status report required by § 63.9(h) of the General Provisions, a plan that~~

~~(A) Identifies the operating parameter to be monitored to ensure that the capture efficiency measured during the initial compliance is maintained,~~

~~(B) Discusses why this parameter is appropriate for demonstrating ongoing compliance, and~~

~~(C) Identifies the specific monitoring procedures;~~

~~(c) The reporting provisions of 40 CFR part 63 subpart A of this part that apply and those that do not apply to Permittees of affected sources subject to this subpart are listed in Table 1 of this subpart.~~

~~(d) Each Permittee of an affected source subject to this subpart shall submit the reports specified in paragraphs (b)(1) through (b)(6) of this section to the Administrator:~~

~~(1) A Notification of Performance Tests specified in § 63.7 and § 63.9(e) if this part. This notification, and the site-specific test plan required under § 63.7(c)(2) shall identify the operating parameter to be monitored to ensure that the capture efficiency measured during the performance test is maintained. The operating parameter identified in the site-specific test plan shall be considered to be approved unless explicitly disapproved, or unless comments received from U.S. EPA or IDEM, OAM require monitoring of an alternative parameter.~~

~~(2) A Notification of Compliance Status specified in § 63.9(h) of this part.~~

~~(3) Performance test reports specified in § 63.10(d)(2) of this part.~~

~~(4) Start-up, shutdown, and malfunction reports specified in § 63.10(d)(5) of this part, except that the provisions in subpart A pertaining to start-ups, shutdowns, and malfunctions do not apply unless a control device is used to comply with this subpart.~~

~~(A) If actions taken by a Permittee during a start-up, shutdown, or malfunction of an affected source (including actions taken to correct a malfunction) are not completely consistent with the procedure specified in the source's start-up, shutdown, and malfunction plant specified in § 63.6(e)(3) of this part, the Permittee shall state such information on the report. The start-up, shutdown, or malfunction report shall consist of a letter containing the name, title, and signature of the responsible official who is certifying its accuracy.~~

~~(B) Separate start-up, shutdown, or malfunction reports are not required if the information is included in the report specified in paragraph (5).~~

~~(5) A summary report specified in § 63.10(e)(3) of this part shall be submitted on a semi-annual basis (i.e., once every six-month period). In addition to a report of operating parameter exceedances as required by § 63.10(e)(3)(i), the summary~~

~~report shall include, as applicable:~~

~~(A) Exceedances of the standards in §§ 63.824-63.825.~~

~~(B) Exceedances of either of the criteria of § 63.820(a)(2).~~

~~(C) Exceedances of the criterion of § 63.821(b)(1) and the criterion of § 63.821(b)(2) in the same month.~~

~~(D) Exceedances of the criterion of § 63.821(a)(2)(ii)(A).~~

D.1.1 Graphic Arts Operations [326 IAC 8-5-5]

(a) The Permittee may not cause, allow, or permit the operation of the facility unless the Permittee installs and operates an incineration system(s) that oxidizes at least ninety percent (90%) of the nonmethane volatile organic compounds (volatile organic compounds measured as total combustible carbon) to carbon dioxide and water.

(b) A capture system must be used in conjunction with each emission control system. The capture system shall attain an efficiency sufficient to achieve an overall control efficiency, in conjunction with the emission control system, of sixty-five percent (65%) for packaging rotogravure processes.

(c) The thermal oxidizing incinerator for two (2) rotogravure printing presses identified as C-7 and C-10 and one (1) pilot packaging rotogravure printing press, identified as Texmac shall maintain a minimum operating temperature of 1,400 ^{o}F or a temperature, fan amperage and duct velocity determined in the compliance tests (described in Condition D.1.8) to maintain a minimum 90% overall destruction of the nonmethane VOC captured.

(d) The thermal oxidizing incinerator for one (1) packaging rotogravure printing press, identified as C-8, shall maintain a minimum operating temperature of 1,400 ^{o}F or a temperature, fan amperage and duct velocity determined in the compliance tests (described in Condition D.1.8) to maintain a minimum 90% overall destruction of the nonmethane VOC captured.

D.1.2 Compliance Certification, Record Keeping and Reporting Requirements for Certain Coating Facilities Using Control Devices [326 IAC 8-1-12]

326 IAC 8-1-12 applies only to facilities that use control devices to comply with 326 IAC 8-5-5.

(a) Each incineration control system shall be operated and maintained according to the manufacturer's recommendations but may be modified based on the results of the initial or subsequent compliance test or upon the written request of IDEM, OAM.

(b) A copy of the operating and maintenance procedures shall be maintained in a convenient location at the source property and as close to each control system as possible for reference by plant personnel and IDEM, OAM inspectors.

D.1.3 General Provisions Relating to HAPs [326 IAC 20-1-1] [40 CFR Part 63, Subpart A]

The provisions of 40 CFR 63, Subpart A - General Provisions, which are incorporated as 326 IAC 20-1-1, apply to the facility described in this section except when otherwise specified in 40 CFR 63, Subpart KK.

D.1.4 Printing and Publishing Industry NESHAP [326 IAC 20-18-1] [40 CFR 63, Subpart KK]

This facility is subject to 40 CFR 63, Subpart KK, which is incorporated by reference as 326 IAC 20-18-1. A copy of the rule is attached. The Permittee shall comply with all applicable provisions of this rule on and after May 30, 1999.

(a) The four (4) packaging rotogravure printing presses (C-7, C-10, C-8, and Texmac) shall limit emissions to no more that five (5) percent of the organic HAP applied for the month.

(b) The Permittee shall demonstrate compliance with this standard by operating capture systems and control devices and demonstrating an overall organic HAP control efficiency of at least ninety-five (95) percent for each month. The Permittee shall show compliance by demonstrating:

(1) Initial compliance through performance tests of capture efficiency and control device efficiency following the procedures in Condition D.1.8; and

(2) Continuing compliance through continuous monitoring of capture system and control device operating parameters following the procedures in Condition D.1.10.

(c) The facility is in compliance with the ninety-five (95) percent overall organic HAP control efficiency requirement for the month if for each press or group of presses controlled by a common control device:

(1) The overall organic HAP control efficiency as determined by the procedures in Condition D.1.8 for each press or group of presses served by that control device and a common capture system is equal to or greater than ninety-five (95) percent;

(2) The oxidizer is operated such that the average combustion temperature is greater than the minimum combustion temperature established in accordance with the provisions of Condition D.1.10 for each three (3) hour period; and

(3) The average capture system operating parameter value for each capture system serving that control device is greater than or less than (as appropriate) the operating parameter value established for that capture system in accordance with the provisions of Condition D.1.10 for each three (3) hour period.

D.1.5 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for each facility and the control devices.

D.1.6 Startup, Shutdown, and Malfunction Plan [40 CFR 63.6(e)(3) General Provisions]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall develop and implement a written startup, shutdown, and malfunction (SSM) plan that describes, in detail, procedures for operating and maintaining the facility during periods of startup, shutdown, and malfunction and a program of corrective action for malfunctioning process and air pollution control equipment used to comply with 40 CFR 63, Subpart KK. As required under 40 CFR 63.8(c)(1)(i) (General Provisions), the plan shall identify all routine or otherwise predictable continuous monitoring system (CMS) malfunctions. This plan shall be developed by the Permittee by the facility's compliance date, May 30, 1999. The plan shall be incorporated by reference into the source's Part 70 permit.

(a) The purpose of the SSM plan is to –

(1) Ensure that, at all times, the Permittee operates and maintains the facility, including associated air pollution control equipment, in a manner consistent with good air pollution control practices for minimizing emissions at least to the level required by the rule;

(2) Ensure that the Permittee is prepared to correct malfunctions as soon as practicable after their occurrence in order to minimize excess emissions of HAP; and

(3) Reduce the reporting burden associated with periods of startup, shutdown, and malfunction (including corrective action taken to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation).

(b) During periods of startup, shutdown, and malfunction, the Permittee shall operate and maintain the facility (including associated air pollution control equipment) in accordance with the procedures specified in the SSM plan developed under this condition.

(c) Recordkeeping associated with the SSM plan is identified in Condition D.1.12. Reporting associated with the SSM plan is identified in Condition D.1.14.

(d) The Permittee shall keep the written SSM plan on record after it is developed to be made available for inspection, upon request, by IDEM, OAM for the life of the facility or until the facility is no longer subject to this rule. In addition, if the SSM plan is revised, the Permittee shall keep previous (i.e., superseded) versions of the SSM plan on record, to be made available for inspection, upon request, by IDEM, OAM, for a period of 5 years after each revision to the plan. Revisions to the SSM plan are automatically incorporated by reference and do not require a permit revision.

(e) To satisfy the requirements of this condition, the Permittee may use the facility's standard operating procedures (SOP) manual, or an Occupational Safety and Health Administration (OSHA) or other plan, provided the alternative plans meet all the requirements of this condition and are made available for inspection when requested by IDEM, OAM.

(f) IDEM, OAM shall determine whether acceptable operation and maintenance procedures are being used, based on information available to IDEM, OAM, which may include, but is not limited to, monitoring results, review of operation and maintenance procedures (including the SSM plan required in this condition), review of operation and maintenance records, and inspection of the facility.

Based on the results of such determination, IDEM, OAM may require that the Permittee make changes to the SSM plan for the facility. IDEM, OAM may require reasonable revisions to a SSM plan, if IDEM, OAM finds that the plan:

(1) Does not address a startup, shutdown, or malfunction event that has occurred;

(2) Fails to provide for the operation of the facility (including associated air pollution control equipment) during a startup, shutdown, or malfunction event in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by all relevant standards; or

(3) Does not provide adequate procedures for correcting malfunctioning process and/or air pollution control equipment as quickly as practicable.

(g) If the SSM plan fails to address or inadequately addresses an event that meets the characteristics of a malfunction but was not included in the SSM plan at the time the Permittee developed the plan, the Permittee shall revise the SSM plan within forty-five (45) days after the event to include detailed procedures for operating and maintaining the facility during similar malfunction events and a program of corrective action for similar malfunctions of process or air pollution control equipment.

Compliance Determination Requirements

D.1.7 Testing Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-1-12, each incineration control system shall be tested according to the following schedule and in the following situations:

(a) Compliance tests shall be conducted no later than every thirty (30) months after the date of the initial test required when the control system became subject to this rule.

(b) A compliance test shall be conducted whenever the Permittee chooses to operate a control system under conditions different from those that were in place at the time of the previous test.

(c) A compliance test shall be performed within ninety (90) days of:

(1) Startup of a new coating facility;

(2) Changing the method of compliance for an existing coating facility from compliance coatings or daily-weighted averaging to control devices; or

(3) Receipt of a written request from IDEM, OAM or U.S. EPA.

(d) All compliance tests shall be conducted according to a protocol approved by IDEM, OAM at least thirty (30) days before the test. The protocol shall contain, at a minimum, the following information:

(1) Test procedures.

(2) Operating and control system parameters.

(3) Type of VOC containing process material being used.

(4) The process and control system parameters that will be monitored during the test.

D.1.8 Testing Requirements [40 CFR 63.827]

Pursuant to the Printing and Publishing Industry NESHAP, initial compliance with the ninety-five (95) percent overall organic HAP control efficiency requirement in Condition D.1.4 shall be demonstrated for each thermal oxidizer within 180 days after May 30, 1999 in accordance with the following:

(a) Determine the oxidizer destruction efficiency (E) using the following procedure:

(1) An initial performance test to establish the destruction efficiency and the associated combustion zone temperature for each oxidizer shall be conducted and the data reduced in accordance with the following reference methods and procedures:

(i) Method 1 or 1A of 40 CFR 60, Appendix A is used for sample and velocity traverses to determine sampling locations.

(ii) Method 2, 2A, 2C, or 2D of 40 CFR 60, Appendix A is used to determine gas volumetric flow rate.

(iii) Method 3 of 40 CFR 60, Appendix A is used for gas analysis to determine dry molecular weight.

(iv) Method 4 of 40 CFR 60, Appendix A is used to determine stack gas moisture.

(v) Methods 2, 2A, 3, and 4 of 40 CFR 60, Appendix A shall be performed, as applicable, at least twice during each test period.

(vi) Method 25 of 40 CFR 60, Appendix A, shall be used to determine organic volatile matter concentration, except as provided in (A) through (C) below. The Permittee shall submit notice of the intended test method to IDEM, OAM for approval along with notice of performance test required under 40 CFR 63.7(c) (General Provisions). The Permittee may use Method 25A of 40 CFR 60, Appendix A, if:

(A) An exhaust gas organic volatile matter concentration of 50 parts per million by volume (ppmv) or less is required to comply with Condition D.1.4, or

(B) The organic volatile matter concentration at the inlet to the control system and the required level of control are such to result in exhaust gas organic volatile matter concentrations of 50 ppmv or less, or

(C) Because of the high efficiency of the control device, the anticipated organic volatile matter concentration at the control device exhaust is 50 ppmv or less, regardless of inlet concentration.

(vii) Each performance test shall consist of three separate runs; each run conducted for at least one hour under the conditions that exist when the affected source is operating under normal operating conditions. For the purpose of determining organic volatile matter concentrations and mass flow rates, the average of results of all runs shall apply.

(viii) Organic volatile matter mass flow rates shall be determined using the following equation:

$$M_f = Q_{sd} \left[\sum_{i=1}^{n} C_i M W_i \right] [0.0416] [10^{-6}]$$

where the symbols of this equation are defined in 40 CFR 63.822 (Definitions) of the rule, a copy of which is attached to this permit.

(ix) Emission control device efficiency shall be determined using the following equation:

$$E = [M_{fi} - M_{fo}] / M_{fi}$$

(2) The Permittee shall record such process information as may be necessary to determine the conditions of the performance test. Operations during periods of start-up, shutdown, and malfunction shall not constitute representative conditions for the purpose of a performance test.

(3) For the purpose of determining the value of the oxidizer operating parameter that will demonstrate continuing compliance, the time-weighted average of the values recorded during the performance test shall be computed. The Permittee shall establish as the operating parameter the minimum combustion temperature. These minimum temperatures are the operating parameter values that demonstrate continuing compliance with the requirements of Condition D.1.4.

(b) Determine the capture system capture efficiency (F) of each capture system venting organic emissions to a control device for the purposes of meeting the requirements of Condition D.1.4 by conducting a performance test. For permanent total enclosures, capture efficiency shall be assumed as 100 percent. Procedure T – Criteria for and Verification of a Permanent or Temporary Total Enclosure as found in 40 CFR 52.741, Appendix B shall be used to confirm that an enclosure meets the requirements for permanent total enclosure.

(c) Calculate the overall organic HAP control efficiency, (R), achieved using the following equation:

R = EF / 100

where E and F are determined according to paragraphs (a) and (b) of this condition.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.9 Monitoring Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-1-12, a temperature monitoring device capable of continuously recording the temperature of the gas stream in the combustion zone of each incinerator shall be used. The temperature monitoring device shall have an accuracy of one percent (1%) of the temperature being measured in degrees Centigrade, or plus or minus five-tenths degree Centigrade (± 0.5 °C), whichever is more accurate.

D.1.10 Monitoring Requirements [40 CFR 63.828]

Pursuant to the Printing and Publishing Industry NESHAP, following the date on which the initial performance test of each control device is completed, to demonstrate continuing compliance with the standard, the Permittee shall monitor and inspect each control device required to comply with Condition D.1.4 to ensure proper operation and maintenance by implementing the following requirements:

(a) For the oxidizers, the Permittee shall install, calibrate, operate, and maintain a temperature monitoring device equipped with a continuous recorder. The device shall have an accuracy of ±1 percent of the temperature being monitored in °C or ±1 °C, whichever is greater. The thermocouple or temperature sensor shall be installed in the combustion chamber at a location in the combustion zone.

(b) All temperature monitoring equipment shall be installed, calibrated, maintained, and operated according to manufacturers' specifications. The calibration of the chart recorder, data logger, or temperature indicator shall be verified every three months; or the chart recorder, data logger, or temperature indicator shall be replaced. The replacement shall be done either if the Permittee chooses not to perform the calibration, or if the equipment cannot be calibrated properly.

(c) To demonstrate continuous compliance by monitoring an operating parameter to ensure that the capture efficiency measured during the initial compliance test is maintained, the Permittee shall:

(1) Submit to IDEM, OAM with the compliance status report required in Condition D.1.14(b), a plan that:

(i) Identifies the operating parameter to be monitored to ensure that the capture efficiency measured during the initial compliance test is maintained;

(ii) Discusses why this parameter is appropriate for demonstrating ongoing compliance; and

(iii) Identifies the specific monitoring procedures.

(2) Set the operating parameter value, or range of values, that demonstrate compliance with Condition D.1.4; and

(3) Conduct monitoring in accordance with the plan submitted to IDEM, OAM unless comments received from IDEM, OAM require an alternate monitoring scheme.

(d) Any excursion from the required operating parameters that are monitored in accordance with this condition, unless otherwise excused, shall be considered a violation of Condition D.1.4.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.11 Record Keeping Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-1-12, the Permittee shall collect and record each day for each coating facility:

(a) The name and identification of each coating used at each coating facility.

(b) The mass of VOC per unit volume of coating solids, as applied, the volume solids content, as applied, and the volume, as applied, of each coating expressed in units necessary to determine compliance, used each day at each coating facility.

(c) The maximum VOC content (mass of VOC per unit volume of coating solids, as applied) or the daily weighted average VOC content (mass of VOC per unit volume of coating solids, as applied) of the coatings used each day on each coating facility.

(d) The required overall emission reduction efficiency for each day for each coating facility.

(e) The actual overall emission reduction efficiency achieved for each day for each coating facility as determined during the compliance test required by Condition D.1.7.

(f) Control device monitoring data as follows:

(1) Continuous records of the temperature in the gas stream in the combustion zone of each incinerator.

(2) Records of all three (3) hour periods of operation in which the average combustion temperature of the gas stream in each combustion zone was more than fifty degrees Fahrenheit (50 °F) (twenty-eight degrees Centigrade (28 °C)) below the average combustion temperature that existed during the most recent test that demonstrated that the coating facility was in compliance.

(g) A log of operating time for each capture system, control device, monitoring equipment, and the associated coating facility.

(h) A maintenance log for each capture system, control device, and monitoring equipment detailing all routine and non-routine maintenance performed including dates and duration of any outages.

(i) The records required in paragraphs (a) through (h) of this condition shall be maintained in accordance with the requirements of Condition C.20 and 326 IAC 8-1-9(c).

D.1.12 Record Keeping Requirements [40 CFR 63.829]

(a) Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall maintain the following records on a monthly basis:

(1) Records of all measurements needed to demonstrate compliance with Condition D.1.4. These records shall include at a minimum the following specified in 40 CFR 63.10(b)(2) (General Provisions) that are applicable:

(i) The occurrence and duration of each startup, shutdown, or malfunction of operation (i.e., process equipment);

(ii) The occurrence and duration of each malfunction of the air pollution control equipment;

(iii) All maintenance performed on the air pollution control equipment;

(iv) Actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) when such actions are different from the procedures specified in the SSM plan required by Condition D.1.6;

(v) All information necessary to demonstrate conformance with the SSM plan required in Condition D.1.6 when all actions taken during periods of startup, shutdown, and malfunction (including corrective actions to restore malfunctioning process and air pollution control equipment to its normal or usual manner of operation) are consistent with the procedures specified in such plan. (The information needed to demonstrate conformance with the SSM plan may be recorded using a "checklist", or some other effective form or recordkeeping, in order to minimize the recordkeeping burden for conforming events);

(vi) Each period during which a continuous monitoring system (CMS) is malfunctioning or inoperative (including out-of-control periods);

(vii) All required measurements needed to demonstrate compliance with Condition D.1.4 (including, but not limited to, 15-minute averages of CMS data, raw performance testing measurements, raw performance evaluation measurements, and control device and capture system operating parameter data, that support data that the source is required to report);

(viii) All results of performance tests and CMS performance evaluations;

(ix) All measurements as may be necessary to determine the conditions of performance tests and performance evaluations;

(x) All CMS calibration checks;

(xi) All adjustments and maintenance performed on CMS;

(xii) All documentation supporting initial notifications of compliance status under 40 CFR 63.9 (General Provisions).

(2) Records for each applicability determination performed by the Permittee in accordance with the requirements of 40 CFR 63.820(a) of this rule. The records and conditions for recordkeeping are specified in 40 CFR 63.10(b)(3) (General Provisions) and are as follows:

(i) If the Permittee determines that their stationary source that emits (or has the potential to emit, without considering controls) one or more hazardous air pollutants is not subject to 40 CFR 63, Subpart KK, the Permittee shall keep a record of the applicability determination on site at the source for a period of 5 years after the determination, or until the source changes its operations to become an affected source, whichever comes first.

(ii) The record of the applicability determination shall include an analysis (or other information) that demonstrates why the Permittee believes the source is unaffected (e.g., because the source is an area source). The analysis (or other information) shall be sufficiently detailed to allow IDEM, OAM to make a finding about the source's applicability status with regard to the relevant standard or other requirement.

(iii) If relevant, the analysis shall be performed in accordance with requirements established in this rule for this purpose. If relevant, the analysis should be performed in accordance with EPA guidance materials published to assist sources in making applicability determinations under Section 112 of the Federal Clean Air Act, if any.

(3) Records for each CMS operated by the Permittee in accordance with the requirements of Condition D.1.10. These records are in addition to complying with the requirements specified in paragraph (a)(1) of this condition, and shall include at a minimum the following specified in 40 CFR 63.10(c) (General Provisions) that are applicable:

(i) All required CMS measurements (including monitoring data recorded during unavoidable CMS breakdowns and out-of-control periods);

(ii) The date and time identifying each period during which the CMS was inoperative except for zero (low-level) and high-level checks;

(iii) The date and time identifying each period during which the CMS was out of control, as defined in 40 CFR 63.8(c)(7) (General Provisions);

(iv) The specific identification (i.e., the date and time of commencement and completion) of each period of excess emissions and parameter monitoring exceedances, as defined in the rule, that occurs during startups, shutdowns, and malfunctions of the facility;

(v) The specific identification (i.e., the date and time of commencement and completion) of each time period of excess emissions and parameter monitoring exceedances, as defined in the rule, that occurs during periods other than startups, shutdowns, and malfunctions of the facility;

(vi) The nature and cause of any malfunction (if known);

(vii) The corrective action taken or preventive measures adopted;

(viii) The nature of the repairs or adjustments to the CMS that was inoperative or out of control;

(ix) The total process operating time during the reporting period; and

(x) All procedures that are part of a quality control program developed and implemented for CMS under 40 CFR 63.8(d) (General Provisions).

(xi) In order to satisfy the requirements of paragraphs (vi) through (viii) of this condition and to avoid duplicative recordkeeping efforts, the Permittee may use the SSM plan or records kept to satisfy the recordkeeping requirements of the SSM plan specified in Condition D.1.6, provided that such plan and records adequately address the requirements of paragraphs (vi) through (viii) of this condition.

(b) The records required in paragraph (a) of this condition shall be maintained in accordance with the following requirements of 40 CFR 63.10(b)(1) (General Provisions):

(1) The Permittee shall maintain files of all information (including all reports and notifications) required by this rule recorded in a form suitable and readily available for expeditious inspection and review.

(2) The files shall be retained for at least five years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent two years of data shall be retained on site. The remaining three years of data may be retained off site.

(3) Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

D.1.13 Reporting Requirements [326 IAC 8-1-12]

Pursuant to 326 IAC 8-1-12, the Permittee shall notify IDEM, OAM in either of the following instances:

(a) Any record showing noncompliance with the applicable requirements for control devices shall be reported by submitting a copy of the record to IDEM, OAM within thirty (30) days following noncompliance; such record shall also be submitted with the quarterly compliance monitoring report attached to this permit. The following information shall accompany each submittal:

(1) Name and location of the coating facility.

(2) Identification of the control system where the noncompliance occurred and the coating facility it served.

(3) Time, date and duration of the noncompliance.

(4) Corrective action taken.

(b) At least thirty (30) calendar days before changing the method of compliance from control devices to the use of compliant coatings or daily-weighted averaging, the Permittee shall comply with all applicable requirements of 326 IAC 8-1-10(b) or 8-1-11(b), respectively. Upon changing the method of compliance from control devices to the use of compliant coatings or daily-weighted averaging, the Permittee shall comply with all requirements of 326 IAC 8-1-10(b) or 8-1-11(b), respectively, applicable to the coating facility subject to 326 IAC 8-5-5.

D.1.14 Reporting Requirements [40 CFR 63.830]

Pursuant to the Printing and Publishing Industry NESHAP, the Permittee shall submit the reports and plans listed below to the following addresses:

**Indiana Department of Environmental Management
Compliance Branch, Office of Air Management
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015**

and

**United States Environmental Protection Agency, Region V
Air and Radiation Division, Air Enforcement Branch - Indiana (AE-17J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590**

(a) A Notification of Performance Tests specified in 40 CFR 63.7 and 63.9(e) (General Provisions). This notification, and the site-specific test plan required under 40 CFR 63.7(c)(2) (General Provisions) shall identify the operating parameter to be monitored to ensure that the capture efficiency measured during the performance test is maintained. The operating parameter identified in the site-specific test plan shall be considered to be approved unless explicitly disapproved, or unless comments received from IDEM, OAM require monitoring of an alternate parameter.

(b) A Notification of Compliance Status specified in 40 CFR 63.9(h) (General Provisions).

(c) Performance test reports specified in 40 CFR 63.10(d)(2) (General Provisions).

(d) Start-up, shutdown and malfunction (SSM) reports specified in 40 CFR 63.10(d)(5) (General Provisions).

(i) If actions taken by the Permittee during a start-up, shutdown, or malfunction of the facility (including actions taken to correct a malfunction) are not completely consistent with the procedures specified in the facility's SSM plan specified in Condition D.1.6, the Permittee shall report the actions taken for that event in strict accordance with 40 CFR 63.10(d)(5)(ii), i.e., within two (2) working days after commencing actions inconsistent with the plan, followed by a letter within seven (7) working days after the end of the event. The SSM report shall consist of a letter containing the name, title, and signature of the responsible official who is certifying its accuracy; shall be submitted to IDEM, OAM; and shall otherwise comply with the provisions of 40 CFR 63.10(d)(5)(ii).

(ii) Separate start-up, shutdown, or malfunction reports are not required if the information is included in the report specified in paragraph (e) of this condition.

(e) A summary report specified in 40 CFR 63.10(e)(3) (General Provisions) shall be submitted on a semi-annual basis (i.e., once every six-month period). In addition to a report of operating parameter exceedances as required by 40 CFR 63.10(e)(3)(i) (General Provisions), the summary report shall include exceedances of the standard in Condition D.1.4.

(f) The monitoring plan required in Condition D.1.10(c), to ensure continuous capture efficiency compliance, submitted with the compliance status report required in paragraph (b) of this condition.